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DP277 ‘Virtual Gateway Connection’

Modification Report

Version 0.2

14 November 2024

Corporate member of
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About this document

This document is a Modification Report. It currently sets out the background, issue, solution, impacts, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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This document also has one annex:

- **Annex A** contains the business requirements for the solution.

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1. Summary

This proposal has been raised by Chris Barlow from the Data Communications Company (DCC).

The Smart Energy Code (SEC) currently requires a physical DCC Gateway Connection at a SEC Parties' premises to allow secure file transfers to and from the DCC. This is the case for all DCC Users excluding Registered Data Providers (RDPs). [MP248 'Requirements for DCC Gateway Connection'](#), implemented as part of the November 2024 SEC Release, updated the SEC to allow the DCC to share files with RDPs, and in turn allow RDPs to share acknowledgement messages without the need for a physical connection.

All other DCC Users are currently required to establish a fixed line connection to access the DCC network. The DCC has approximately 130 new organisations raising concerns about the incompatibility of having a physical DCC Gateway Connection with their cloud-based IT infrastructure. The DCC has also stated there are three existing DCC Users who are not RDPs, who have expressed interest for a virtual connection.

The impact of the current arrangements presents a challenge for all new DCC Users due to the potential costs and time associated in establishing a physical DCC Gateway Connection. It also presents challenges for existing DCC Users wishing to transition to a Virtual DCC Gateway Connection and may be preventing potential cost savings.

The Proposed Solution would provide the option for new and existing DCC Users to connect to the DCC via a Virtual DCC Gateway Connection.

Smart Energy Code Administrator and Secretariat (SECAS) is targeting this modification for implementation in the February 2025 SEC Release. This modification will be a Self-Governance modification.

2. Issue

What are the current arrangements?

What is a DCC Gateway Connection?

A DCC Gateway Connection is designed to ensure a secure and reliable connection for Data communication between DCC Users and the DCC. The ordering of DCC Gateway Connections is provisioned for by the following sections of the SEC:

- SEC Section E 'Registration Data'
- SEC Section H 'DCC Services'
- SEC Appendix G 'DCC Gateway Connection Code of Connection'

Organisations(except for RDPs following the implementation of MP248) that want to connect to the DCC network must use a fixed-line connection. This means that the organisation's IT system needs a direct physical connection to the DCC network through specific infrastructure. The SEC identifies this

as a DCC Gateway Connection. In order for a DCC User to obtain a DCC Gateway Connection the following steps must be completed:

- DCC receives completed connection form
- Gateway Party receives initial quote (five Working Days)
- Gateway Party provides authority to proceed (up to thirty calendar days)
- DCC Carries out a physical site survey (thirty calendar days)
- Gateway Party receives revised quote (ten Working Days)
- Gateway Party accepts revised quote (up to thirty calendar days)
- Connection and equipment are installed (within 90 Working Days for high volume connection or, 25 Working Days for a low volume connection)

SEC Section H 'DCC Services' covers the requirement for DCC Users on how to interact with the DCC. It currently states that to interact with the DCC, a DCC User requires a DCC Gateway Connection, which by definition, is placed within the organisation's premises. This will require a site visit, equipment costs and can take approximately 90 days or greater to set up. This is to enable Data being sent from the DCC to the DCC User to be transferred securely.

The DCC have two types of connection available. These are high volume connections and low volume connections.

High volume connections

When a high volume connection is installed, the DCC state there it is likely to be ten or 20 megabits per second available for the DCC User. If more bandwidth is required, high volume connections can usually be upgraded up to a maximum of 100 megabits per second. This upgrade is a chargeable request.

Low volume connections

When a low volume connection is installed, the DCC state there is likely to be up to 40 megabits per second download speed and a ten megabits per second upload speed providing there is superfast broadband connection available at the Party's Data centre. If this is not available, then a standard broadband connection will be provided which the DCC state there is likely to be up to 20 megabits per second download speed and a 2.5 megabits per second upload speed. If the Party needs to move to a high volume connection, then it will need to apply for a new high volume connection. The Party may then choose to cancel the low volume connection.

DCC Gateway Connection charges

There are two types of applicable charges in relation to a Physical DCC Gateway Connections: the connection charge and the annual charge.

Connection charge

The connection charge recovers the cost of installing the physical DCC Gateway Connection and will be payable to the DCC following installation. The connection charges will depend on the specific requirements of each individual connection, as outlined in SEC Section H15 and Appendix G: DCC Gateway Connection Code of Connection.

The variables that will influence the level of this charge include:

- Physical distance from the premises of the physical DCC Gateway Connection to the local exchange
- Configuration of the premises of the DCC Systems i.e. whether there are existing connections that can be used or whether new lines will be required
- Type of connection determined e.g. ethernet, Fibre to the Cabinet (FTTC), Asymmetric Digital Subscriber Line (ADSL) and/or copper
- The amount of further work required as determined by a physical site inspection; and
- The bandwidth requested by the Connecting Party.

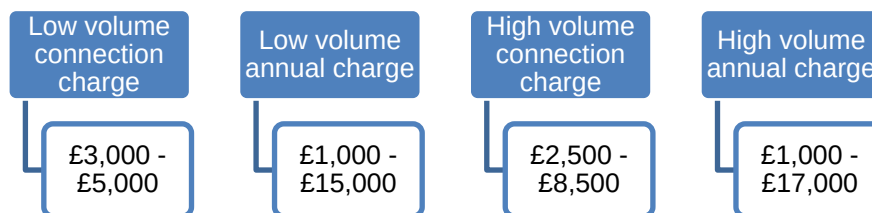
Annual charge

The annual charge recovers the annual rental cost associated with the connection and will be payable to the DCC at the start of each contractual year. The charge will be dependent on the specific requirements on each individual connection, as outlined in Section H15 and Appendix G: DCC Gateway Connection Code of Connection.

The variables that will influence the level of this charge include:

- The length of the contract i.e. one year or three years;
- Type of connection determined e.g. ethernet, FTTC, ADSL and/or copper; and
- The bandwidth requested by the Party

The figures below show the indicative explicit charges for a physical DCC Gateway Connection. More around the charges can be found in the [DCC Charging Statement](#).



What is the issue?

SEC Section H 'DCC Services' specifies that organisations connecting to the DCC must use physical, on-premises infrastructure to ensure a secure link between their system and the DCC's services. While this was appropriate when the SEC was first implemented, it has now become a barrier for many potential and existing DCC Users.

The DCC have stated that it has three existing DCC Users who are not RDPs requesting a virtual connection. The current SEC requirements mean that these three existing DCC Users have to pay a fee of annual charges as described above.

The DCC have received approximately 130 queries from new organisations which are cloud-based. These organisations have expressed the challenges around the requirements to become a DCC Users via a physical DCC Gateway Connection. Due to technological advancements, organisations are moving their IT systems to cloud-based systems. The Gateway Connection requirement has become increasingly outdated and incompatible with how most businesses operate today. The current arrangements do not cater to many potential new DCC Users who want to connect to the DCC.

What is the impact this is having?

The current physical DCC Gateway Connection requirements represent potential impracticalities for these cloud-based organisations. Organisations want cloud-based options to align with their current IT models, but the existing SEC requirements for a DCC Gateway Connection are not as operably efficient as possible when paired with these cloud-based systems. This mismatch creates additional lead times and costs to spend on physical premises they otherwise would not require if the option to have a virtual connection exists during onboarding to the DCC.

The SEC obligation of having a physical DCC Gateway Connection is obstructing potential DCC User cost savings during the DCC onboarding process, as it does not align with modern cloud-based infrastructure utilised by the majority of interested Parties. Additionally, potential and expected benefits of becoming a DCC Users may be delayed, as establishing a physical DCC Gateway connection is a longer process than that of establishing a virtual connection.

Organisations that are currently operating with a physical DCC Gateway Connection but are looking to migrate to the cloud based systems are still required in line with current SEC obligations to maintain a physical DCC Gateway Connection. These limitations hinder both growth and modernisation.

Costs for DCC Users

The DCC Charging Statement indicates costs associated with Physical DCC Gateway Connections which include the initial connection set up fees and annual maintenance fees. It is thought that establishing a Virtual DCC Gateway Connection would significantly lower these costs for some Users. This inconsistency creates a challenge under the SEC which aims to facilitate fair and efficient access to the DCC network, potentially limiting equitable cost benefits across the energy sector.

Impact on consumers

Without a virtual alternative to the physical DCC Gateway Connection, there is a potential unnecessary time delay in the adoption of smart technologies. Consequently, this could hinder a consumer's ability to reduce their energy costs and contribute to a more sustainable energy system providing the Energy Consumer is utilising in a suitable manner.

3. Solution

Proposed Solution

The Proposed Solution will provide the option for new and existing DCC Users to connect to the DCC via a Virtual DCC Gateway Connection by selecting a new option from the Data Service Provider (DSP) Service Catalogue. In addition, the DCC will also need to make changes to the DCC Charging Statement to reflect costs associated with a Virtual DCC Gateway Connection.

4. Impacts

This section summarises the impacts that would arise from the implementation of this modification.

SEC Parties

SEC Party Categories impacted			
✓	Large Suppliers	✓	Small Suppliers
✓	Electricity Network Operators	✓	Gas Network Operators
✓	Other SEC Parties	✓	DCC

Breakdown of Other SEC Party types impacted			
✓	Shared Resource Providers	✓	Meter Installers
✓	Device Manufacturers	✓	Flexibility Providers
✓	DCC Other Users	✓	MAPs/ MAMs

DCC

The DCC will be affected by this Proposed Solution, as a change to the DSP service Catalogue will be required. However, the Proposed Solution does not impact the DCC Total System, therefore has a minimal impact. This will involve changes to the SEC but could enhance DCC's service flexibility and improve User satisfaction across those SEC Parties who wish to take up the use of a Virtual Gateway Connection.

Large Suppliers

Large Suppliers are directly affected as they are significant Users of the DCC network for accessing Smart Meter Data. Virtual connectivity could reduce their connection costs and streamline their operations, especially if they plan to transition to, or already host their IT in, cloud-based systems. This option may also lower ongoing infrastructure maintenance costs and offer improve flexibility and functionality.

Small Suppliers

The Proposed Solution could offer potential cost and time savings to Small Suppliers as this could reduce the expenses tied to Physical DCC Gateway Connections. A virtual connection could alleviate some operational pressures and make access to the DCC network more accessible and manageable.

Electricity and Gas Network Operators

Network Operators could see improved Data flow and coordination with other DCC Users, which may support grid flexibility and management. There is also a potential for cost savings by eliminating physical connections.

Shared Resource Providers

Shared Resource Providers, who may serve multiple SEC Parties with IT and network services, are directly impacted as they will need to support virtual connections for their clients.

Meter Installers

Meter installers are indirectly impacted. While they do not connect directly to the DCC network, the flexibility in DCC access could benefit meter Data handling and streamline processes for their clients (the Suppliers). Indirectly, it may lead to smoother installation procedures and data access for completed installations.

DCC Other Users

DCC Other Users, who may consist of new energy Service Providers, are directly impacted by this solution. For them, a virtual gateway provides a more time efficient entry point to DCC services, reducing the potential operational efficiencies of maintaining a physical connection.

DCC Systems

DCC System changes

This modification will not require DCC System changes.

DCC System traffic

This modification will not have an impact on DCC System traffic.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section A 'Definitions and Interpretation'
- Section E 'Registration Data'
- Section H 'DCC Services'

- Section G 'Security'
- Appendix G 'DCC Gateway Connection Code of Connection'

Devices

There will be no impact to Devices from this modification.

Consumers

There are expected positive impacts to consumers from the implementation of this modification.

The Proposed Solution may have a positive impact on consumers as more organisations could have more efficient access to DCC resources.

Other industry Codes

There are no expected impacts on other industry Codes from this modification.

Greenhouse gas emissions

There are expected positive impacts to greenhouse gas emissions from this modification. The Proposed Solution could support decarbonisation goals by accelerating onboarding for DCC Users. Faster access to DCC services could facilitate cleaner energy management practices, thereby reducing the energy sectors carbon footprint overtime. The Proposed Solution could have a positive impact to greenhouse gas emissions by introducing a method of connecting to the DCC without the need for a physical premises, reducing site visits and physical equipment to be present at the SEC Parties premise.

5. Costs

DCC costs

There are expected DCC costs relating to the addition of a new option in the DSP Service Catalogue .

SECAS costs

The estimated Smart Energy Code Administrator and Secretariat SECAS implementation cost to implement this as a stand-alone modification is one day of effort, amounting to approximately £600. This cost will be reassessed when combining this modification in a scheduled SEC Release. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

SEC Party costs

Any potential SEC Party costs associated with this modification will be determined in the Refinement Consultation.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **27 February 2025** (February 2025 SEC Release) if a decision to approve is received on or before 13 February 2025; or
- **Ad hoc SEC Release** if a decision to approve is received after 13 February 2025

This modification will become an Ad hoc SEC Release if the February 2025 SEC Release becomes an unattainable implementation target. This modification could have immediate cost and time saving benefits for some new and existing DCC Users, henceforth the urgency of implementing the Proposed Solution as quickly as possible.

7. Assessment of the proposal

Areas for assessment

Would the introduction of cloud-based connections impact existing DCC Users with fixed-line infrastructure?

The DCC has stated that both fixed-line and cloud-based connections would be supported and there would be no changes associated with fixed line connections should DCC Users choose not to move to a cloud-based connection.

What additional security measures would be necessary to protect cloud-based connections to the DCC network?

Continued monitoring in line with existing processes would also be critical to ensure that any unusual or unauthorised behaviour is detected promptly. As part of MP248, the SSC and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) provided input into the Virtual DCC Gateway Connection framework and did not identify any risks with virtual connection. The SSC will be required to provide input in the level of preparation required for this modification to be implemented.

What alternatives do organisations have if a virtual alternative to fixed-line connectivity is not implemented?

Organisations will still be able to establish a physical DCC Gateway Connection. However, an organisation may choose to delay their onboarding to the DCC until a more flexible, cloud-based connection option is available. This could have the potential to slow their integration into the smart energy ecosystem and delay their contribution to decarbonisation efforts.

Sub-Committee input

SECAS will engage with the Chairs from the OPSG, TABASC, SSC, SMKI PMA, the Testing Advisory Group (TAG) and the Privacy Sub-Committee (PSC) to confirm what input is required from these forums. SECAS believes the following Sub-Committees will need to provide the following input to this modification:

Sub-Committee input	
Sub-Committee	Input sought
OPSG	Review operational feasibility and implications of the solution
TABASC	Review technical feasibility and implications of the solution
SSC	Input sought to review if any additional security measures are necessary to protect cloud-based connections
SMKI PMA	Review technical feasibility and implications
TAG	No input required
PSC	No input required

Solution development

Previous SEC modification for cloud connectivity

A modification implemented in the November 2024 SEC Release, [MP248 'Requirements for DCC Gateway Connection'](#), had been raised to allow the DCC to share files with RDPs without the need for a physical connection.

MP248 addressed the RDPs need for a flexible connection option that aligned with their cloud-based infrastructure, rather than relying on the traditional physical DCC Gateway Connection. This initial focus on RDPs served as a test case for a more adaptable connectivity model within the DCC framework.

While MP248 was being discussed, the DCC recognised the need to explore a broader solution applicable to all DCC Users. This wider effort aims to extend the framework of the MP248 solution, offering similar cloud-based connectivity options for new and existing DCC Users that are also moving towards a cloud infrastructure. Essentially, the solution framework and design principles established under MP248 will form the foundation for all DCC Users who select a Virtual Gateway, ensuring consistency in approach, security, and reliability.

MP248 solution design background

To ensure a robust solution design, the SSC, SMKI PMA and the TABASC provided input on the security, technical and architectural aspects of MP248. The feedback received ensured that any

cloud-based connectivity aligns with DCC security requirements and standards. The scope of MP248 only catered to RDPs.

When MP248 was initially discussed at the TABASC, concerns were raised regarding the wording of the business requirements which aimed at offering virtual connectivity to RDPs only. It was suggested that the requirements should explicitly extend to encompass all DCC Users, ensuring consistency in implementation. However, the DCC highlighted that the solution was aimed at RDPs only. The TABASC were satisfied with the rationale. The TABASC emphasised that it would be beneficial to include a transition process within the modification to facilitate Parties wishing to migrate from physical to virtual DCC Gateway Connections to ensure a smooth transition for all involved. This was facilitated for RDPs as part of MP248.

The SSC and SMKI PMA were satisfied with the security architecture associated with virtual DCC Gateway Connections and recommended that a User Competent Independent Organisation (CIO) Assessment to be completed. The DCC advised this will take place following the implementation of MP248, and should be set up after this Modification completes. SECAS will confirm with the DCC as to whether this has begun or has already been completed.

Views from the Issues Group

A member questioned if virtual DCC Gateway Connections would make it easier for Manufacturers to connect to the DCC for live testing. They queried whether User Integrated Testing (UIT) aspects are being investigated in line with the issue. The DCC stated that testing environments and other connections are not in scope for this modification. The issue was presented to the Issues Group as part of the November 2024 Working Group meeting. Members agreed that the Proposed Solution addresses the issue.

Views from the TABASC

A member acknowledged that a previous modification MP248 included a solution for RDPs only and that they anticipated this modification to be a larger piece of work due to the complexities of all DCC Users sending and receiving larger volumes of Data rather than the daily delta file which RDPs receive from the DCC.

The TABASC Chair queried whether or not virtual DCC Gateway Connections will be implemented as part of the DSP re-procurement. The DCC confirmed that this will be the case.

The DCC highlighted that when MP248 had been discussed with the SSC the discussions applied to all DCC Users rather than RDPs only, therefore the solution to MP248 had paved the way for all Users to access virtual connectivity.

The DCC advised that it would include a table of indicative costs for cloud connectivity in the Preliminary Assessment so that it can be compared to the physical costs. This will provide a clear understanding for Service Users if they will be saving costs and time by opting for a virtual DCC Gateway Connection.

The TABASC Chair stated that they are interested with the progression of this modification and would like to review the Preliminary Assessment.

8. Case for change

Business case

Approval of the modification

The Proposed Solution is directed by the need to modernise connectivity between the DCC and DCC Users. The current reliance on physical connections imposes setup and maintenance costs. A virtual connection would reduce these costs, streamlining onboarding, and encourage more organisations to engage with the DCC network. As more DCC Users join through a virtual connection, the DCC can better support the decarbonisation efforts, enhancing Data sharing and system flexibility crucial to renewable energy integration and energy management.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification will better facilitate SEC Objectives (a)¹, (d)² and (e)³ by enabling a more efficient onboarding and enduring operation of new and existing Users. This flexibility ensures improved functionality and potentially lower costs for some DCC Users making it easier and faster to connect. The costs and setup time associated with a virtual connection may help lower entry barriers for new organisations and reduce ongoing operational costs. The flexibility and scalability of a Virtual DCC Gateway Connection promotes innovation in energy network operations, enabling a DCC User to adopt advanced energy management technologies.

Industry views

SECAS will gain industry views throughout the Refinement Process and Working Group discussions.

Views against the consumer areas

Improved safety and reliability

This modification would have a positive impact against improved reliability. This would be demonstrated in the introduction of flexibility across the market and by lowering operational costs.

Lower bills than would otherwise be the case

This modification would have a positive impact against lowering bills. This would be demonstrated in by lowering operational costs for DCC Users in turn, this could lower bills for end consumers.

¹ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers premises within Great Britain

² Facilitate effective competition between persons engaged in, or in Commercial Activities connected with, the Supply of Energy

³ Facilitate such innovation in the design and operation of Energy Networks (as defined in the Data Communications Company Licence) as will best contribute to the delivery of a secure and sustainable Supply of Energy

Reduced environmental damage

This modification would have a positive impact in relation to environmental damage. This would be demonstrated in the journey towards statutory net-zero targets by allowing DCC Users to communicate with the DCC without the need for a physical DCC Gateway Connection.

Improved quality of service

This modification would have a positive impact on the quality of service. Offering a virtual alternative to that of a physical DCC Gateway Connection may increase the reliability of services offered.

Benefits for society as a whole

This modification would have a neutral impact to society as a whole.

Appendix 1: Progression timetable

Timetable	
Event/Action	Date
Business requirements developed with the DCC	28 Oct 2024 – 30 Oct 2024
Issue discussed at Issues Group	6 Nov 2024
Modification discussed with TABASC	7 Nov 2024
Draft Proposal raised	8 Nov 2024
Preliminary Assessment requested	8 Nov 2024
<i>Presented to CSC for initial comment</i>	<i>19 Nov 2024</i>
<i>CSC converts Draft Proposal to Modification Proposal</i>	<i>19 Nov 2024</i>
<i>Modification discussed with SSC</i>	<i>27 Nov 2024</i>
<i>Modification discussed with TAG</i>	<i>27 Nov 2024</i>
<i>Preliminary Assessment returned</i>	<i>6 Dec 2024</i>
<i>Modification discussed with TABASC</i>	<i>10 Dec 2024</i>
<i>Modification discussed with OPSG</i>	<i>10 Dec 2024</i>
<i>Refinement Consultation</i>	<i>11 Dec 2024 – 14 Jan 2025</i>
<i>Modification discussed with Working Group</i>	<i>15 Jan 2025</i>
<i>Modification approved by CSC</i>	<i>21 Jan 2025</i>
<i>Modification Report Consultation</i>	<i>22 Jan 2025 – 13 Feb 2025</i>
<i>Change Board Vote</i>	<i>26 Feb 2025</i>

Italics denote planned events that could be subject to change

Appendix 2: Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
ADSL	Asymmetric Digital Subscriber Line
CIO	Competent Independent Organisation
DCC	Data Communications Company
DSP	Data Service Provider
FTTC	Fibre To The Cabinet
MAM	Meter Asset Manager
MAP	Meter Asset Provider
OPSG	Operations Group
PSC	Privacy Sub-Committee
RDP	Registered Data Provider
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SMS	Smart Metering System
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAG	Testing Advisory Group
UIT	User Integrated Testing

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DP277 ‘Virtual Gateway Connection’

Annex A

Business requirements – version 0.2

About this document

This document contains the business requirements that support the solution for this Modification Proposal. It sets out the requirements along with any assumptions and considerations. The Data Communications Company (DCC) will use this information to provide an assessment of the requirements that help shape the complete solution.

1. Business requirements

This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements			
Ref.	Requirement	Responsible for delivery	MoSCoW
1	Virtual connection option available for new and existing DCC Users	DCC	M
2	DCC Users shall be able to select a virtual connection to the DSP from the DSP service catalogue	DCC	M
3	Virtual connection must be as secure as the current physical connection	DCC	M
4	Provision for onboarding and maintenance of virtual connections	DCC	M
5	Functionality and support are equivalent to a physical DCC Gateway Connection	DCC	M

Key

- M = Must have
- S = Should have
- C = Could have
- W = Won't have

2. Considerations and assumptions

This section contains the considerations and assumptions for each business requirement.

2.1 General

Excluding Registered Data Providers (RDPs) the Smart Energy Code (SEC) requires a physical DCC Gateway Connection at the SEC Parties' premises to allow secure Data transfer with the Data Communications Company (DCC). This requirement is preventing existing and cloud-based organisations wishing to become a DCC User being able to connect in a more cost effective method.

2.2 Requirement 1: Virtual connection option available for new and existing DCC Users

To modernise and streamline the connection process for all new and existing DCC Users, the DCC must provide a virtual gateway connectivity option. This allows all new and existing DCC Users a more flexible and potentially cost-effective method of communicating with the DCC.

2.3 Requirement 2: DCC Users shall be able to select a virtual connection to the DSP from the DSP service catalogue

This requirement allows DCC Users to choose a virtual connection to the Data Service Provider (DSP), making it easier for them to connect with DCC services in a flexible, cost-effective way. By providing this option in the DSP service catalogue, the DCC ensures that Users can access this alternative to physical connections, reducing setup costs and lead times, especially for those using cloud-based infrastructure.

2.4 Requirement 3: Virtual connection must be as secure as the current physical connection

To ensure that the proposed virtual DCC Gateway Connection can meet the security standards set by physical DCC Gateway Connection this modification should undergo a comprehensive assessment. DCC Users wishing to connect virtually must also take all reasonable steps to ensure that a virtual connection is secure as the physical connection from the DCC User side of the connection.

2.5 Requirement 4: Provision for onboarding and maintenance of virtual connections

The DCC must support the onboarding of virtual gateway Users, with defined maintenance and troubleshooting processes. Parties that wish to connect virtually should have support in maintaining their connection(s) through the DCC.

2.6 Requirement 5: Functionality and support are equivalent to a physical DCC Gateway Connection

This requirement will ensure that any virtual DCC Gateway Connections are robust alternatives, aligning with the DCC's goals of a flexible, accessible network.

3. Glossary

This table lists all the acronyms used in this document and the full term they are an abbreviation for.

Glossary	
Acronym	Full term
DCC	Data Communications Company
DSP	Data Service Provider
SMETS	Smart Metering Equipment Technical Specifications
SEC	Smart Energy Code
RDP	Registered Data Provider