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Smart Energy Code

MP167A

'Review of SEC documents (Testing Approach Document criteria)'

Modification Report

Version 1.0

15 November 2022

Corporate member of Plain English Campaign
Committed to clearer communication
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About this document

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

Contents

This document also has one annex:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.

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1. Summary

This proposal has been raised by Tom Rothery from the Data Communications Company (DCC).

Originally, the intent of MP167 was to review the SEC to perform necessary Code rationalisation of Section X 'Transition', T 'Testing during Transition' and Appendix AN 'SVTAD for BEIS Changes included in the November 2020 SEC Release' which all had clauses which were no longer relevant. However, the Smart Energy Code Administrator and Secretariat (SECAS) identified several consequential housekeeping changes that need to be made as a result.

During the Refinement Process, SECAS has engaged extensively with the SEC Sub-Committee Chairs to ensure that whilst removing SEC Section T, sufficient DCC testing obligations are in place for any User-impacting system releases. Due to the need to agree on a definition of 'DCC Internal Systems', MP167 has been split into two separate modifications:

- MP167A (this modification): As SEC Section T no longer applies, this modification will set out the criteria for Testing Approach Documents (TADs) in Section D 'Modifications Process'.
- MP167B: this modification will investigate the potential inclusion of governance framework for testing of a 'DCC Internal Systems' change.

Following discussions with the SEC Sub-Committee Chairs, DCC and SECAS, the Proposed Solution for this modification (MP167A) will implement a revised criteria for the TAD contents that what is currently in place.

This modification will impact the DCC only, has no associated DCC System costs and has a targeted implementation date of 23 February 2023 (February 2023 SEC Release). This modification will be progressed as a Self-Governance Modification.

2. Issue

What are the current arrangements?

The removal of SEC Section T leaves what might be considered insufficient governance of DCC Testing of Releases.

SEC Section T

SEC Section T7.1 states:

> *"This Section T shall cease to apply, and this Code shall automatically be modified so as to delete this Section T, on the last to occur of the following:*
>
> *(a) completion of Interface Testing;*
>
> *(b) completion of End-to-End Testing; and*
>
> *(c) completion of SMKI and Repository Testing."*

Each of the above testing regimes have been delivered, as outlined below.

Interface Testing

This was completed on 4 November 2016 for the Communication Service Provider (CSP) for the Central and South Regions, and 17 November 2016 for CSP North. Documentation of the testing completion for each CSP can be found here.

End-to-End Testing

This was completed on 9 November 2016 for the CSP Central and South, and 25 November 2016 for the CSP North. Documentation of the testing completion for each CSP can be found here.

SMKI and Repository Testing

The final part of the Smart Metering Key Infrastructure (SMKI) and Repository Testing, Part 3b, was approved by the SEC Panel on 15 June 2018. Further information regarding the SEC Panel's approval can be found here.

Further information regarding the SMKI and Repository Testing completion can be found here.

SEC Section X and Appendix AN

The Proposer also identified clauses in Section X and Appendix AN which were no longer relevant. However, since these were straightforward they were removed from MP167A and included in MP212 'Housekeeping changes 2022' which was implemented on 3 November 2022.

Ofgem's views on Code rationalisation

During the April 2021 SEC Panel meeting, Ofgem presented an update on its ongoing work on Code governance[1]. This included its views on Code rationalisation taking place to remove unnecessary and redundant content from Codes that will not impact the effect or meaning of these Codes. It considered that removing unnecessary and redundant content could help Codes be clearer and more accessible.

What is the issue?

SEC Section T is no longer applicable to the Code. Ofgem has also stated during a SEC Panel meeting, that it may be beneficial for SECAS to review the SEC to identify any areas where the Code may be able to be rationalised. It is the intent of this modification to remove Section T.

What is the impact this is having?

Redundant sections being retained within the SEC adds increasing complexity for readers. However, ensuring that sufficient testing criteria is captured in the SEC will mitigate issues when DCC System changes are implemented.

[1] Please see Panel paper SECP_91_1604_21 for more detail.

Impact on consumers

This issue has no impact on Consumers.

3. Solution

Proposed Solution

Removals of expired documents and clauses

For SEC Section T, all existing text from this section will be removed, and text will be added stating that the section no longer applies. The SEC Section will remain as a placeholder. References to SEC Section T will also be amended throughout the SEC. The SEC Lawyer has stated that the removal of SEC Section T does not require a SEC modification as the section contains an automatic deletion clause (T7.1), however the MP167A legal text will acknowledge its removal. Because of SEC Section T's removal, new testing provisions will be added to SEC Section D 'Modifications Process'.

New testing provisions

During the Refinement Process, SECAS has engaged extensively with the SEC Sub-Committee Chairs to ensure that sufficient DCC testing obligations are in place for any User-impacting system releases. It was agreed that in Section T's absence, a review of TAD criteria would be carried out. The DCC has proposed the below list of criteria for the TAD contents:

- the proposed amendments to the SEC that are the subject of the testing, an explanation of the associated changes to the DCC Total System, and the testing objective;
- the testing environments and test phases to be used and how these will be sequenced;
- the Devices to be used in testing (including the use of emulators);
- the requirements (if any) for security testing;
- the requirements (if any) for system capacity testing;
- details of the testing that shall be undertaken, including the scope of testing and the extent of testing (including negative tests) and the approach to regression testing and End Of Cycle testing;
- the applicable Testing Issue thresholds and the process by which DCC may propose to exclude Testing Issues from being counted against the Testing Issue thresholds;
- the process and expected timescales for managing the resolution of extant Testing Issues following completion of a test phase;
- the entry criteria that must be met in order for a test phase to commence and who approves entry;
- the exit criteria that must be met in order for a test phase to complete and who approves exit;
- any key risks (and risk mitigations) identified in respect of the proposed approach to testing;
- the approach to providing assurance of the testing undertaken;

- matters to be included in DCC's test completion reports presented to the Panel; and
- the requirements (if any) for User testing and for determining any associated test completion.

Please note that the amendments to Section T will result in consequential changes to SEC Section A. This is due to defined terms no longer being present in the SEC. Further detail can be found in Annex A.

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

The deletion of Section T will not impact any SEC Party Category, however the DCC will be impacted by the new testing provisions. The DCC will have to abide by the new provisions in SEC Section D prior to a scheduled SEC Release.

DCC System

This modification does not impact DCC Systems nor require testing, however the DCC will be subject to new testing obligations as part of SEC Releases.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section A 'Definitions and Interpretation'
- Section D 'Modification Process'
- Section F 'Smart Metering System Requirements'
- Section H 'DCC Services'
- Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure'
- Section T 'Testing During Transition'
- Section X 'Transition'

The changes to the SEC required to deliver the Proposed Solution can be found in Annex A.

Consumers

More robust testing should mitigate against potential issues within DCC Systems and Smart Metering Systems when new functionality goes live. As a result, a more reliable service will be provided to the consumer.

Other industry Codes

This modification will have no impact on other industry Codes.

Greenhouse gas emissions

This modification will have no impact on greenhouse gas emissions.

5. Costs

DCC costs

There are no DCC costs associated with this change.

SECAS costs

The estimated SECAS implementation costs to implement this modification is one day of effort, amounting to approximately £600. The activities needed to be undertaken for this are:

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

SEC Party costs

SECAS received no responses to the Refinement Consultation, however it does not anticipate any associated Party costs if MP167A is approved.

6. Implementation approach

Approved implementation approach

The Change Sub-Committee (CSC) has agreed an implementation date of:

- **23 February 2023** (February 2023 SEC Release) if a decision to approve is received on or before 9 February 2023; or
- **29 June 2023** (June 2023 SEC Release) if a decision to approve is received after 9 February 2023 but on or before 15 June 2023.

As this is a text-only change with minimal associated process changes, the modification can be implemented ten Working Days following decision. As a result, the earliest release this modification can be implemented in is the February 2023 SEC Release. If, however the Change Board decision takes place after 9 February 2023, the modification will be implemented as part of the June 2023 SEC Release.

7. Assessment of the proposal

Observations on the issue

Originally, the intent of MP167 was to review the SEC to perform necessary Code rationalisation. At the time the proposal was raised, the Proposer had identified two SEC Sections (T and X) and one SEC Appendix (AN) that would benefit from a review. It had been agreed by the Proposer and the Department for Business, Energy & Industrial Strategy (BEIS) that these SEC documents and / or specific clauses are no longer applicable to the SEC should be removed. SEC Lawyers also advised that the removal of SEC Section T and specific clauses within SEC Section X do not require a SEC Modification for removal (due to automatic deletion clauses). However, the Smart Energy Code Administrator and Secretariat (SECAS) identified several consequential housekeeping changes that need to be made as a result so MP167 was raised.

Views of the Sub-Committee Chairs

During the Development Stage, SECAS held a meeting with the Sub-Committee Chairs to discuss initial observations regarding the original Draft Proposal (DP167). The Chairs commented that any proposed change must be carefully thought through and verified with the SEC Lawyer. Furthermore, they added that SECAS must ensure that any enduring arrangements that need to be kept are allocated to the relevant SEC Section.

Views from the SEC Lawyer

During the Development Stage, SECAS engaged with the SEC Lawyer for guidance on the issue defined. The SEC Lawyer stated that SEC Section T is no longer applicable to the Code and should no longer be published. It also stated that a modification is not needed to facilitate this change. However, consequential changes to documents, such as existing references, will need to be captured under a SEC modification.

Solution development

The DCC and SECAS have developed a solution with extensive collaboration with the SEC Sub-Committee Chairs including the Testing Advisory Group (TAG) Chair. In the Working Group discussions, the Proposer added further context that MP167A will ensure that the TAD criteria are in line with best practice and bolsters what is currently in place within the SEC. A Working Group member, who is also a TAG member, commented that recent TADs have been satisfactory in terms of their content. The Proposer clarified that the proposed legal text will reflect what has previously worked well within SEC Section T ‘Testing During Transition’ and the current content of TADs.

Splitting MP167 into two separate modifications

The Sub-Committee Chairs were also keen to ensure changes performed by the DCC which did not involve DCC Central Systems were also subject to testing where they may have an impact on business Users. However, agreement of the definition of 'DCC internal systems' continued to be difficult to reach. For that reason, the DCC, SECAS and Sub-Committee Chairs agreed that the modification should be split. SECAS notified the Working Group that the intention was to separate MP167 into two separate modifications to address the issues identified in the two separate areas. As there is a clear solution for MP167A, SECAS proposed to stagger the two modifications, progressing MP167A first. The Working Group agreed with this approach.

Refinement Consultation

SECAS received no responses to the Refinement Consultation.

Views of the Testing Advisory Group

SECAS presented the Proposed Solution to the TAG to obtain feedback on the revised SEC Section D TAD criteria. The TAG was wholly supportive of the Proposed Solution, however requested that there is a caveat within the legal text that the criteria is not exhaustive and can be added to (though not codified) as future TADs are developed. The legal text has been amended to facilitate this request.

8. Case for change

Business case

Codifying the TAD criteria in SEC Section T's absence should mitigate the risk of Users experiencing issues due to new functionality being delivered through SEC Releases. Codifying an agreed criteria for these documents will allow the DCC to carry out the necessary testing to deliver additional functionality and improvements to Users with minimal drawbacks as any issues should have been identified during the testing phase. Users and Sub-Committees will still have oversight of testing via the TAG.

Views against the General SEC Objectives

Proposer's views

The Proposer believes that this modification better facilitates SEC Objectives (a)[2] and (e)[3]. This is due to the Proposed Solution implementing detailed TAD criteria, which will result in greater efficiency of smart metering, while also facilitating innovation and design through implementing the changes.

Industry views

The Working Group agreed with the Proposer's views on the objectives.

Views against the consumer areas

Improved safety and reliability

This modification will have a positive impact on safety and reliability as it will ensure that sufficient testing takes place for SEC Releases.

Lower bills than would otherwise be the case

This modification will have a neutral impact on the cost of energy bills.

Reduced environmental damage

This modification will have a neutral impact on environmental damage.

Improved quality of service

This modification will result in an improved quality of service as the codified testing should mitigate the risks of issues when SEC Releases that impact the DCC Systems go live.

Benefits for society as a whole

This modification will benefit society as carrying out sufficient testing ahead of a SEC Release going live will mean that smart metering services should face minimal interruption, while providing benefits of the implemented change.

Final conclusions

The removal of SEC Section T will make the SEC more efficient, while the enhanced TAG criteria will provide a more robust approach to the testing of DCC Systems that relate to a SEC Modification.

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[2] Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain.

[3] Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy.

Appendix 1: Progression timetable

Following the CSC's agreement that this modification should progress to the Report Phase, SECAS will issue the Modification Report Consultation before presenting the modification to the Change Board for decision under Self-Governance.

Timetable	
Event/Action	**Date**
Draft Proposal raised	7 Jun 2021
Engage with SEC Lawyer to provide a brief on the proposal	Late Jun 2021
Presented to CSC for decision	29 Jun 2021
Proposed Solution developed with the Proposer	Jul – Nov 2021
Draft legal text developed with the Proposer and SEC Lawyer	Dec 2021
Further solution development	Jan – Apr 2022
Modification discussed at Working Group	4 May 2022
Further solution development	May – Jul 2022
MP167 formally split into MP167A and MP167B	30 Aug 2022
Modification discussed at Working Group	7 Sep 2022
Refinement Consultation	26 Sep – 14 October 2022
Modification Report approved by CSC	15 Nov 2022
Modification Report Consultation	*16 Nov – 7 Dec 2022*
Modification approved by Change Board	*21 Dec 2022*
Refinement Consultation	*26 Sep – 14 October 2022*

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**
BEIS	Department for Business, Energy and Industrial Strategy
CSC	Change Sub-Committee
CH	Communications Hub
CSP	Communication Service Provider
DCC	Data Communications Company
DCCKI	Data Communications Company Key Infrastructure
OPSG	Operations Group
SEC	Smart Energy Code
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority

Glossary	
Acronym	**Full term**
SSC	Security Sub-Committee
SECAS	Smart Energy Code Administrator and Secretariat
SMIP	Smart Metering Implementation Programme
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SVTAD	SEC Variation Testing Approach Document
TABASC	Technical Architecture and Business Architecture Sub-Committee
TAD	Testing Approach Document
TAG	Testing Advisory Group