

Duncan Stone
Smart Metering Implementation Programme,
Department for Business, Energy & Industrial Strategy,
1 Victoria Street,
London, SW1H 0ET

19 July 2019

Dear Duncan,

Re: Live Services Criteria for the initial entry onto the Eligible Product Combination List (EPCL) for SMETS1

In your letter dated 18 April 2019, you set out the SEC Panel's role in the assurance of Smart DCC Ltd's (DCC) operational readiness to commence provision of the relevant SMETS1 services.

The Panel's initial expectation was that we would consider the full Initial Operating Capability (IOC) and we note the subsequent reduction. The Panel has considered, on 19 July 2019, the evidence submitted by the DCC regarding the readiness to migrate and operate dormant-only, dual fuel Itron Device Model Combinations (DMC).

This release lays the foundation for future IOC releases and decision-making by the Panel. We anticipate that future decisions, confirming that full IOC functionality is available and adding new EPCL entries, will be made in late October 2019. At that point, we expect that activities and remediation plans noted by the sub-committees are complete. This would include full functionality being available; learnings from this release are incorporated into future plans; the capacity to support full volumes is proved; and that the ability to migrate at maximum rate is demonstrated.

The Panel would also like to be clear on future arrangements post this initial EPCL. For example, how and when will full IOC be declared, when all EPCL entries for IOC have completed or when DCC is running at its intended full migration capacity. We understand that BEIS are considering these matters.

In advance of the Panel meeting on 19 July 2019, DCC submitted the Live Services Criteria (LSC) document on 5 July 2019 along with supporting evidence, including test completion reports and Systems Integration Test auditor report. The Testing Advisory Group (TAG), Operations Group (OPSG) and Security Sub-Committee (SSC) reviewed the LSC submission and documentation.

The SEC Panel would note that, despite this initial entry onto the EPCL and the limited number of installations, care must be taken even with the migration of dormant metering systems. These are live consumers who may be impacted by any failure of the process; this could have the potential for a profound impact on consumers' perception of the smart metering programme.

This letter serves as our report to the Secretary of State regarding the DCC's readiness to provide the relevant Services.

Views Relating to the Entry and Exit Criteria of the Testing Phases:

The TAG has reviewed each of the DCC's completion reports in relation to the relevant testing phases for SMETS1 Services and has confirmed that the entry and exit criteria have been met.

Views Relating to the Live Services Criteria:

The TAG, OPSG and SSC reviewed the Live Services Criteria submission and assessed the criteria relevant to each of the groups. The Panel, TAG, OPSG and SSC accepted the DCC statement of readiness, noting the points detailed below.

LSC 8 – No detrimental impact to consumers

A Panel member noted an expectation that the DCC's Production Proving Function would have been available before this release is made live, and that its availability could have mitigated some transition risk. We would hope that this capability is available for the next IOC decision or that, in the event that it is not available, the DCC will set out how this risk can be mitigated.

LSC 9 – Business Continuity Disaster Recovery

The OPSG had some concerns regarding LSC 9 "Assurance of required Business Continuity/Disaster Recovery". The OPSG recognise that comprehensive BCDR testing cannot be carried out until the migration commences; the OPSG also recognise that the initial EPCL is limited in volume.

The OPSG have given this an amber rating but the view of the OPSG is that this amber status should not preclude a recommendation to go live. The DCC have confirmed they will provide a statement by the 19 July 2019 setting out how they will address these concerns.

LSC 10 – Security Testing

The SSC has approved LSC 10 after agreeing with the DCC a remediation plan and that the DCC will report progress to SSC on a two-weekly basis.

The TAG, OPSG and SSC's views on the evidence and discussion, were presented to the Panel on 19 July. Having considered the Live Services Criteria and supporting evidence from the DCC, and views from the TAG, OPSG and SSC, the Panel agrees:

- I. with the Sub-Committees' recommendation to accept the DCC statement of readiness.
- II. that the initial entry onto the EPCL for SMETS1 may be deployed to live operations as planned on the 28 July 2019.

If you would like to discuss the above in further detail, please do not hesitate to contact myself or SECAS via 020 7090 7755 or SECAS@gemserv.com.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Peter Davies'.

Peter Davies

SEC Panel Chair

CC: Panel Members
SEC Parties
DCC
Authority

Attachment A: SMETS1 Live Services Criteria for the first entry onto the Eligible Products Combination List (EPCL) for SMETS1