Peter Davies, Panel Chair
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Duncan Stone
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14th March 2018

Dear Duncan,

R.E: Consultation on changes to the Smart Energy Code to permit DCC to develop and use a Production Proving Capability

Thank you for the opportunity to respond to the consultation on the DCC Production Proving capability.

This response covers the SEC Panel observations and views on the consultation, particularly from the perspective of any interactions it has with existing activities and deliverables being undertaken by the DCC. The Panel assumes that the views of individual SEC Parties on the scheme will be submitted separately.

This response consists of general observations on the DCC Production Proving Capability and how it fits into the wider delivery of DCC Services along with more specific responses to the questions included in the consultation. The Panel responses to the questions are included in Attachment A to this letter.

Observations on the DCC Production Proving Capability

The Panel welcomes the proposal, particularly if it will provide greater confidence and assurance that the DCC Total System works and continues to work following the deployment of new functionality as part of SEC Releases. It is recognised that this capability will also help reduce the burden on DCC Users as there would be less reliance on Users to highlight live defects, as the Production Proving Capability will hopefully pick up any issues beforehand.

The utilisation of the capability will need to be clearly communicated, especially when used as part of any release based activities. For example, if the service is used at the point new release content is deployed and goes live, in advance of making it widely available to Users, the timescales and associated activities will need to be documented in the release go live plans.

In addition, consideration may need to be given to what would occur if a major issue arose during Production Proving, but before the release was made widely available, resulting a decision being required to suspend/pause the release deployment until the issue was resolved. This may need to be achieved through appropriate engagement with the SEC Panel and the Authority.

Delivery of the Capability alongside existing work activities

The delivery of the Production Proving capability is an additional service/activity that the DCC will undertake, and will also be an additional activity to deploy and set up. This needs to be managed so that it does not interfere with existing DCC activities and deliverables. Therefore, it is expected that the attention of resource, focused on releases delivery and analysis/impact assessments of changes is not utilised to delivery this capability. If it is, existing work activities could be delayed, having impacts on the efficient delivery of existing release scopes, future release scopes and Modification Proposals currently with the Modification Process.

While the Authority is responsible for monitoring the DCC costs, it is important to observe that the costs indicated in the consultation are ranges, and are not finalised costs as of yet. If the costs are higher than the upper levels indicated, SEC Parties will need to be advised accordingly in a transparent and as efficient manner as possible.

Final observations

The Panel would finally like to note and re-emphasise that Release 2.0 is the first major release where any unresolved issues arising from testing or in the delivery of the Release 2.0 functionality is likely to directly affect the end consumer experience of smart metering, due to the expected increase in volumes of SMETS2 meters in 2018. While the delivery of the DCC Production Proving is expected to aid Release 2.0, it is important that the delivery of this additional services and activities do not interfere with the timely delivery of this release.

If you would like to discuss this further, please do not hesitate to contact myself or the SECAS team on 020 7090 7755 or SECAS@gemserv.com.

Yours sincerely,

Peter Davies

SEC Panel Chair

Copied to: SEC Panel Members, Ofgem and SEC Parties.

Attachment A – Responses to the specific Consultation Letter Questions

Question no.	Question	Response
1	Do you agree with BEIS's view that the SEC should be amended in order to permit the DCC to carry out Production Proving in line with DCC's proposed Option 3?	Based on the analysis provided, Option 3 seems to achieve the aims of the Production Proving capability. It also seems to deliver the required outcome in a reasonable amount of time. A detailed plan and timescales on what will be delivered and when would be beneficial, so that the use of the capability can be factored into any timescales for forthcoming releases (particularly Release 2.0). In addition, as the costs indicated are prudent estimates, it is important that SEC Parties are duly notified as soon as the costs are confirmed, especially if there is a significant increase following the completion of the necessary full Impact Assessments.
2	Do you have any comments on BEIS's proposed SEC changes to allow DCC to carry out the Production Proving Function?	The proposed changes seem sensible and appear to deliver the necessary changes in support of Option 3.
3	Do you have any other comments on the proposals within this consultation?	It is noted in the consultation that the delivery of the DCC Production Proving capability will be achieved through a phased approach. Based on information provided at the Panel Sub-Committees it has been noted that the aim is to have the service up and running to enable Production Proving of Release 2.0. It is important that the delivery of the Production Proving capability does not interfere with the ongoing delivery of this Release. It is expected that there is no overlap in resourcing to ensure that the Release 2.0 timescales and milestones continue to be met. In addition, the delivery timescales indicated are 4-6 months, will there be enough time to put in place the capability following designation of the necessary SEC changes, or will the DCC need to proceed at risk in putting the capability in place? The prompt for this query is that the necessary SEC changes may not have completed the necessary parliamentary process activities and applied to the SEC until late April 2018, leaving only approximately 5 months until the targeted Release 2.0 go-live date of the end of September 2018 (per the DCC non-contingent plan). Also, the full Impact Assessment analysis for delivering the capability should not interfere with and be unduly prioritised over existing Preliminary and Full Impact Assessments of industry change. Further delay to the assessment of Modifications may impact industry driven changes, and should

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		be considered carefully, and effectively communicated with the Panel, and the SECAS Modification team. Finally, is it noted that further consideration is required on how Production Proving can be used in support of the SMETS1 Enrolment and Adoption release. The impacts, timescales and resourcing should be shared with interest parties and the SEC Panel, in order to understand whether extending the capability to cover SMETS1 is an efficient and effective activity.