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MP167A

‘Review of SEC documents (Testing Approach Document criteria)’

Modification Report

Version 1.0

15 November 2022



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

1. Summary.....	3
2. Issue.....	3
3. Solution	5
4. Impacts	6
5. Costs	7
6. Implementation approach	7
7. Assessment of the proposal	8
8. Case for change.....	9
Appendix 1: Progression timetable	11
Appendix 2: Glossary	11

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 governance¹. 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.

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
<i>Modification Report Consultation</i>	<i>16 Nov – 7 Dec 2022</i>
<i>Modification approved by Change Board</i>	<i>21 Dec 2022</i>
<i>Refinement Consultation</i>	<i>26 Sep – 14 October 2022</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
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

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MP167A ‘Review of SEC Documents (Testing Approach Document criteria)’

Legal text – version 1.0

Annex A

About this document

This document contains the redlined changes to the SEC that would be required to deliver this Modification Proposal.

Section A 'Definitions and Interpretation'

These changes have been redlined against Section A version 28.0.

Amend the following definitions as follows:

Additional Interface Testing	has the meaning given to that expression in Section T3.34 (Additional Interface Testing).
Additional Interface Testing Objective	has the meaning given to that expression in Section T3.35 (Additional Interface Testing).
Additional SIT	has the meaning given to that expression in Section T2.25 (Additional Systems Integration Testing).
Additional SIT Objective	has the meaning given to that expression in Section T2.26 (Additional Systems Integration Testing).
Additional SMKI and Repository Testing	has the meaning given to that expression in Section T5.30 (Additional SMKI and Repository Testing).
Additional SRT Objective	has the meaning given to that expression in Section T5.31 (Additional SMKI and Repository Testing).
Common Test Scenarios Document	means the SEC Subsidiary Document set out in Appendix R, which is originally to be developed pursuant to Section T6 (Development of Enduring Testing Documents).
Device Selection Methodology	has the meaning given to that expression in Section T1.3 (Device Selection Methodology).
End-to-End Testing	means the testing described in Section T4 (End-to-End Testing).
End-to-End Testing Approach Document	(a) has the meaning given to that expression in Section T4.4 (End-to-End Testing Approach Document).
Enduring Testing Approach Document	means the SEC Subsidiary Document set out in Appendix J, which is originally to be developed pursuant to Section T6 (Development of Enduring Testing Documents).

Interface Testing	means the testing <u>that tests the capability of the DCC and the DCC Systems together with the Communications Hubs selected pursuant to Section T1 to interoperate with User Systems described in Section T3 (Interface Testing).</u>
Interface Testing Approach Document	has the meaning given to that expression in Section T3.8 (Interface Testing Approach Document).
Interface Testing Objective	has the meaning given to that expression in Section T3.2 (Interface Testing Objective).
SIT Approach Document	has the meaning given to that expression in Section T2.5 (SIT Approach Document).
SIT Objective	has the meaning given to that expression in Section T2.2 (SIT Objective).
SMKI and Repository Test Scenario Document	means the SEC Subsidiary Document of that name set out in Appendix K, <u>which is originally to be developed pursuant to Section T6 (Development of Enduring Testing Documents).</u>
SMKI and Repository Testing	means the testing <u>described in Section T5 (SMKI and Repository Testing) that tests the capability of the DCC and the component parts of the DCC Systems to interoperate with the Systems of Parties to the extent necessary for the SMKI Services and the SMKI Repository Service.</u>
SRT Approach Document	has the meaning given to that expression in Section T5.5 (SRT Approach Document).
SRT Objective	has the meaning given to that expression in Section T5.2 (SRT Objective).
Systems Integration Testing	means the testing <u>described in Section T2 (Systems Integration Testing) that tests the capability of the DCC and the component parts of the DCC Systems together with the Communications Hubs selected pursuant to Section T1 to interoperate with each other and with the RDP Systems.</u>
Testing Objectives	means one or more of the SIT Objective and the Interface Testing Objective.

Testing Participant

means, in respect of each Testing Service, the persons (whether or not they are Parties) who are entitled to undertake such tests, as described in Section H14 (Testing Services), ~~together with any other persons identified as such in Section T (Testing During Transition).~~

Section D 'Modification Process'

These changes have been redlined against Section D version 8.0.

Amend Section D10 as follows:

SEC Release Management Policy

D10.7 The implementation of an approved Modification Proposal will take place as part of a SEC Release. The Panel shall ensure that the implementation of a SEC Release is undertaken in accordance with a policy for determined by the Panel (the "Panel SEC Release Management Policy").

D10.8 The Panel shall ensure that the SEC Release Management Policy:

- (a) includes a mechanism for allocating Modification Proposals into SEC Releases;
- (b) defines a mechanism by which the Panel shall co-ordinate and oversee the content; and
- (c) defines a mechanism by which notice is to be given to Users prior to the implementation of a SEC Release;
- (d) defines a mechanism by which the Panel shall review the main components of the forecast and actual costs of a SEC release and, if requested by the Authority, how the Panel, shall provide a report on this to the Authority; and
- (e) defines a mechanism by which the Panel shall determine that the SEC Release shall be put into live operation.

D10.9 The Panel shall make the Panel Release Management Policy available to the DCC and Users on the SEC Website. The Panel shall consult with the DCC and Users before it first establishes the Panel Release Management Policy, and before it makes any changes to the Panel Release Management Policy.

D10.10 The DCC shall co-operate with the Panel in planning and implementing SEC Releases in accordance with the SEC Release Management Policy and shall provide any information reasonably requested by the Panel for this purpose.

D10.11 The Panel may appoint, or require DCC to appoint, an external auditor to monitor the DCC's implementation process, plans and progress in support of a SEC Release, and shall approve any such external auditor's terms of reference. The DCC must co-operate with any external auditor that is appointed, including (but not limited to) allowing access to such records, test results, test laboratories and test witnessing as the external auditor may reasonably require.

SEC Release Implementation Document

D10.12 The Panel shall develop and publish a “SEC Release Implementation Document” for each SEC Release in accordance with the SEC Release Management Policy.

D10.13 The Panel shall ensure that each SEC Release Implementation Document:

- (a) defines the content of the SEC Release;
- (b) defines the timescales associated with implementing the content of the SEC Release, including timescales for the commencement and completion of DCC and User testing phases;
- (c) defines how the DCC shall report progress towards readiness;
- (d) defines the testing that will be undertaken by the DCC for the SEC Release;
- (e) defines the required User testing and how the DCC shall support Users to test the changes that make up the SEC Release; and
- (f) defines the SEC Release go-live criteria that shall be agreed by the Panel in accordance with the SEC Release Management Policy.

D10.14 The DCC shall provide any information reasonably requested by the Panel that is required for inclusion in the SEC Release Implementation Document for a SEC Release.

D10.15 The Panel shall approve the SEC Release Implementation Document and any subsequent amendments.

D10.16 The DCC shall be required to undertake the implementation and testing activities for a SEC Release as set out in the relevant SEC Release Implementation Document once approved by the Panel.

D10.17 Any Party that wishes to appeal the Panel approval of the SEC Release Implementation Document may do so within 10 Working Days following the publication of the decision to approve. Any appeal referred to the Authority, must specify the reasons for the appeal. The Authority shall determine what action to take with the appeal (which determination shall, without prejudice to section 173 of the Energy Act 2004, be final and binding for the purposes of this Code).

SEC Release Testing Approach Document

D10.18 The DCC, on request of the Panel, shall produce a document setting out how the requirements of Sections D10.13(d) and (e) will be satisfied (the “SEC Release Testing Approach Document”). A SEC Release Testing Approach Document shall be considered as part of the SEC Release Implementation Document for the relevant SEC Release.

D10.19 The DCC shall ensure that each SEC Release Testing Approach Document sets out the following, as a minimum, in respect of the SEC Release in question:

- ~~(a) defines the testing objectives, including the assurance to be achieved;~~
- ~~(b) defines the testing strategy that will be followed; and~~

- ~~(c) sets out the consequences of the testing strategy, including costs and risks in business terms.~~
- ~~(a) the proposed amendments to this Code that are the subject of the testing, an explanation of the associated changes to the DCC Total System, and the testing objective;~~
- ~~(b) the testing environments and test phases to be used and how these will be sequenced;~~
- ~~(c) the Devices to be used in testing (including the use of emulators);~~
- ~~(d) the requirements (if any) for security testing;~~
- ~~(e) the requirements (if any) for system capacity testing;~~
- ~~(f) 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;~~
- ~~(g) 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;~~
- ~~(h) the process and expected timescales for managing the resolution of extant Testing Issues following completion of a test phase;~~
- ~~(i) the entry criteria that must be met in order for a test phase to commence and who approves entry;~~
- ~~(j) the exit criteria that must be met in order for a test phase to complete and who approves exit;~~
- ~~(k) any key risks (and risk mitigations) identified in respect of the proposed approach to testing;~~
- ~~(l) the approach to providing assurance of the testing undertaken;~~
- ~~(m) matters to be included in DCC's test completion reports presented to the Panel; and~~
- ~~(n) the requirements (if any) for User testing and for determining any associated test completion.~~

~~D10.20~~ The DCC shall prepare and consult upon each SEC Release Testing Approach Document and any subsequent amendments. The DCC shall report to the Panel on the outcome of each such consultation. The Panel shall review and determine whether to approve each SEC Release Testing Approach Document and any subsequent amendments.

~~D10.20~~D10.21 The DCC and each person other than the DCC that participates in (or is required to participate in) testing under a SEC Release Testing Approach Document shall comply with the document approved by the Panel (including such amendments as are approved by the Panel from time to time).

Section F 'Smart Metering System Requirements'

These changes have been redlined against Section F version 12.0.

Amend Section F10 as follows:

Provision of Test Communications Hubs

- F10.4 The DCC shall, ~~from the relevant date set out in the End-to-End Testing Approach Document,~~ provide Test Communications Hubs to other Parties and to any other person that requests them (in each case in accordance with the other provisions of this Section F10). The DCC shall take reasonable steps to provide Test Communications Hubs from an earlier date. ~~Where the DCC is able to make Test Communications Hubs available from an earlier date, the DCC shall publish a notice to that effect on the DCC Website.~~
- F10.5 Where a person that is not a Party wishes to order Test Communications Hubs, the DCC shall offer terms upon which Test Communications Hubs may be ordered. Such offer shall be provided as soon as reasonably practicable after receipt of the request, and shall be based on the Specimen Enabling Services Agreement (subject only to such variations from such specimen form as are reasonable in the circumstances). A person that is bound by an agreement entered into with the DCC pursuant to this Section F10.5 shall be a **"TCH Participant"**. The DCC shall not provide Test Communications Hubs to a person that is not a Party or a TCH Participant.
- F10.6 The DCC shall allow Parties and TCH Participants to order and return Test Communications Hubs via a reasonable means.
- F10.7 The DCC shall publish on the DCC Website a guide describing the process by which Parties and other persons may obtain and return Test Communications Hubs.

Section H 'DCC Services'

These changes have been redlined against Section H version 16.0.

Amend Section H14 as follows:

General: Systems and Devices

- H14.9 The DCC shall provide such facilities as are reasonably required in relation to the Testing Services, including providing:
- (a) for access to the Testing Services either at physical test laboratories and/or remotely;
 - (b) a reasonable number of Test Communications Hubs for use by Testing Participants at the DCC's physical test laboratories which represent each and every combination of HAN Variant and WAN Variant; and
 - (c) a reasonable number of Devices (other than SMETS2+ Communications Hubs) for use by Testing Participants at the DCC's physical test laboratories, which Devices are to be:

- (i) in the case of SMETS1 Devices as further described or set out in the Enduring Testing Approach Document; or
- (ii) except for SMETS1 Devices, of the same Device Models as ~~those selected pursuant to the Device Selection Methodology and/or such other Device Models as~~ the Panel approves from time to time (provided that, where Test Stubs (or other alternative arrangements) were used then such Tests Stubs (or other alternative arrangements) will be used in place of Devices until the DCC agrees with the Panel which Device Models to use).

H14.10 Without prejudice to Sections H14.9(b) and (c), the DCC shall allow Testing Participants to use Devices they have procured themselves when using the Testing Services. The DCC shall make storage facilities available at the DCC's physical test laboratories for the temporary storage by Testing Participants of such Devices (for no more than 30 days before and no more than 30 days after completion of the Testing Service for which such Devices may be expected to be used). The DCC shall ensure that such storage facilities are secure and only capable of access by persons authorised by the relevant Testing Participant.

H14.10A The DCC may require a Testing Participant to remove its Devices from a DCC physical test laboratory in accordance with the requirements set out in the Enduring Testing Approach Document. Any dispute between the DCC and a Testing Participant regarding the removal of such Devices (or the right to re-commence testing) may be referred to the Panel for its determination (which determination shall be final and binding for the purposes of this Code).

Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure'

These changes have been redlined against Section L version 16.0.

Amend Section L3 as follows:

Certificates for Commissioning of Devices

~~L3.22~~ The DCC shall:

~~(a) prior to the commencement of Interface Testing, or by such later date as may be specified by the Secretary of State, establish and lodge in the SMKI Repository; and~~

~~(b) L3.22 subsequently maintain;~~

such of its Certificates as are necessary to facilitate the installation at premises of Devices that are capable of being Commissioned.

L3.23 For the purposes of Section L3.22, the DCC shall ensure that the Certificates which are established, lodged in the SMKI Repository and subsequently maintained include at least the following:

- (a) the Root OCA Certificate;
- (b) the Issuing OCA Certificate;

- (c) the Root DCA Certificate;
- (d) the Issuing DCA Certificate;
- (e) the Recovery Certificate;
- (f) the DCC (access-Control-Broker) - digitalSignature Certificate;
- (g) the DCC (access-Control-Broker) – keyAgreement Certificate;
- (h) the DCC (wanProvider) Certificate; and
- (i) the DCC (transitionalCoS) Certificate.

Section T ‘Testing during Transition’

SEC Section T is to have all text removed, and replaced with [Not in use] as this document is no longer applicable to the SEC.

~~L3.24~~ Section X ‘Transition’

These changes have been redlined against Section X version 9.0.

Amend Section X1 as follows:

Testing in respect of Additional Release Services

~~X1.18~~~~X1.17~~ A Party seeking to become a User for a particular User Role must undertake the User Entry Process Tests relevant to that User Role, as described in Sections H1 (User Entry Process) and H14 (Testing). ~~Completion of User Entry Process Tests by certain Parties in relation to certain User Roles also forms part of Interface Testing under Section T3 (Interface Testing), and (for so long as Section T4 (End-to-End Testing) applies) User Entry Process Tests are to be undertaken as part of End-to-End Testing.~~ Certain Services are only available to Parties that have become a User for the applicable User Role, as described in Section H3 (DCC User Interface) and the DCC User Interface Services Schedule. Where the Secretary of State makes directions pursuant to Section X3 (Provisions to Become Effective Following Designation) whereby the Common Test Scenarios Document is varied on it first becoming effective so that there are Service Requests that are deemed to be omitted from the document, then the following provisions shall apply:

- (a) the Service Requests that are subject to such a direction shall, for so long as the variation in respect of that Service Request remains in effect, be **"Additional Release Services"**;
- (b) Parties that start User Entry Process Tests at a time where there are Additional Release Services shall undertake (and be able to successfully complete) the User Entry Process Tests without reference to those Additional Release Services;

- (c) a User that completes User Entry Process Tests that did not include testing of Service Requests that used to be (but are no longer) Additional Release Services shall (notwithstanding any other provision of this Code) not be an Eligible User for those Service Requests until that User has successfully completed the applicable Additional SR Tests for those Service Requests; and
- (d) **"Additional SR Tests"** means, in respect of one or more Service Requests that used to be (but are no longer) Additional Release Services, testing equivalent to User Entry Process Tests but undertaken only in respect of those Service Requests. Accordingly, and without limitation, the following shall apply:
 - (i) Additional SR Tests shall constitute a Testing Service, and shall therefore be subject to the provisions of Section H14 (Testing Services);
 - (ii) Additional SR Tests shall be provided by the DCC, and shall be capable of being undertaken by Parties, in accordance with Sections H14.12 to H14.21 (User Entry Process Tests), but:
 - (A) construed by reference to only those relevant Service Requests;
 - (B) where a Party has already demonstrated capability for the purposes of User Entry Process Tests, this can be relied upon for the purposes of the Additional SR Tests (unless the DCC considers that this is not appropriate for those Additional SR Tests);
 - (C) potentially (as provided for in the Common Test Scenarios Document) without the need to re-test the DCC Gateway Connection;
 - (D) without the need to re-test the Self-Service Interface; and
 - (E) subject to any other exceptions provided for in the Common Test Scenarios Document, ~~and~~
- ~~(e) any provisions from time to time applying to User Entry Process Tests pursuant to the Interface Testing Approach Document or the End-to-End Testing Approach Document shall apply equally to Additional SR Tests (unless otherwise set out in those approach documents).~~

Amend Section X9 as follows:

X9. INTERIM DEVICE AND USER SYSTEM TESTING

Interim Device Testing

- X9.1 The DCC shall provide a testing service (referred to in this Section X9 as **"GFI Testing"**) to enable eligible persons to test the interoperability of Devices (other than those comprising Communications Hubs) with the DCC Systems and with the Communications Hubs to be provided as part of the Testing Services, such that those Devices are able to respond to Commands received from or via the DCC in accordance with the requirements defined in the GB Companion Specification. ~~The DCC shall provide GFI Testing as soon as reasonably practicable after this Section X9.1 takes effect, and (in any event) from the commencement of End-to-End Testing.~~

Interaction with Device and User Systems Tests

- X9.7 ~~The DCC shall not provide (and no Party shall be entitled to undertake) any testing of Devices under Section H14.31(a) (Device and User System Tests) during the period (if any) between commencement of GFI Testing and commencement of End-to-End Testing.~~Not used.
- X9.8 ~~The DCC shall not provide (and no Party shall be entitled to undertake) any testing of Systems under Section H14.31(c) (Device and User System Tests) during the period between commencement of Pre-UEPT Testing and commencement of End-to-End Testing.~~Not used.
- X9.9 ~~The DCC shall continue to make the tests under this Section X9 available following the commencement of End-to-End Testing.~~Not used.