



Department for
Business, Energy
& Industrial Strategy

Department for Business,
Energy & Industrial Strategy
1 Victoria Street,
London SW1H 0ET

www.gov.uk/beis

The Authority (Ofgem), the SEC Panel, SEC Parties and other interested parties 11 February 2019

Dear Colleague,

SMART METERING IMPLEMENTATION PROGRAMME CONSULTATION ON APPROVAL OF THE USER TESTING SERVICES APPROACH DOCUMENT FOR SMETS1 SERVICES (UTSAD), AND RE-DESIGNATION OF THE ENDURING TEST APPROACH DOCUMENT (ETAD) AND THE COMMON TEST SCENARIOS DOCUMENT (CTSD)

1. This letter relates to the provision by DCC of a SMETS1 Service and constitutes a consultation on the approval of the UTSAD and for the amended ETAD and CTSD to be incorporated into the SEC with effect from 8 March 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter).

Background

2. On 18 September 2018 BEIS issued a direction to incorporate the SEC Variation Testing Approach Document for SMETS1 Services (SVTAD) into the SEC. The SVTAD sets out the testing that is required to be undertaken in respect of DCC's SMETS1 Service, together with associated rights and obligations. The SVTAD additionally provides for further Testing Approach Documents to be developed by the DCC in consultation with the SEC Panel's Testing Advisory Group (TAG), SEC Parties and other relevant stakeholders, and submitted to the Secretary of State for approval. These Testing Approach Documents include the UTSAD, which DCC has now developed to set out supplementary rights and obligations that apply in relation to testing undertaken during the User Testing Services Test Phase.
3. The DCC has additionally identified a number of amendments to the CTSD and the ETAD that are required to extend existing testing activities in respect of its SMETS1 Service, and to support a new testing service, Pending Product Combinations Tests (PPCT), that applies in respect of its SMETS1 Service.

4. The DCC has consulted with stakeholders on its proposed amendments to the CTSD and ETAD and submitted drafts of these documents to BEIS for re-designation. The DCC has additionally submitted a draft of the UTSAD to BEIS for approval, following consultation with stakeholders, in accordance with the requirements set out in clause 3 of the SVTAD. DCC has informed us that stakeholders' responses to consultations on all three documents have been taken into account when finalising the legal drafting. DCC's consultation conclusions have now been submitted to the Secretary of State are available on the DCC website¹, and the report that has been submitted by the DCC setting out why it considers the submitted documents to be fit for purpose is attached at Annex D.
5. We note that the DCC intends to propose further amendments to the ETAD to accommodate a scenario whereby the PPCT process can be expedited or bypassed (for example, due to a security issue with an existing Device Model). These proposed amendments would need to be appropriately consulted upon by DCC and submitted to the Secretary of State in timescales to allow for the ETAD to be re-designated to include them prior to Initial Operating Capability (IOC) and/or the PPCT testing service going live, should the Secretary of State consider it requisite or expedient to include them.
6. The UTSAD, CTSD and ETAD that are proposed for approval or re-designation (as appropriate) are attached at Annexes A, B and C respectively. The versions attached at Annexes E, F and G respectively show the changes made to the documents since DCC's consultation (as discussed further below).

Further content updates

7. Having reviewed the versions of the UTSAD, ETAD and CTSD that the DCC consulted upon and the versions subsequently submitted to us for designation, we note that a number of changes have been made to the documents by the DCC. The majority of these changes are clarificatory in nature and respond to specific comments received from stakeholders during consultation. Additionally, the section of the ETAD relating to PPCT has been updated to align with the changes to Section H14 of the SEC recently concluded upon by BEIS to provide for circumstances in which the DCC considers that a new Device Model Combination can be added to the list of

¹ See: <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/formal-submission-of-uts-regulatory-documents>

SMETS1 Eligible Product Combinations without the need for testing, due to it being substantively the same as an existing Device Model Combination.

8. The DCC has also made consequential updates to the CTSD to reflect the fact that there are now no Eligible Users for the Service Opt In and Service Opt Out Service Requests. This follows the removal of the DCC opt-out for non-domestic smart metering, which was concluded upon by BEIS in March 2018.
9. BEIS has proposed some further minor changes, most of which address formatting errors or are clarificatory in nature, except for a change to Clause 7.2 of the ETAD to make clear that DCC will provide two SMETS2+ Device sets and two SMETS1 Device sets for User Entry Process Testing (rather than two Device sets overall). Further to a request from the DCC, we have additionally modified the table in clause 8.1.6 of CTSD to reflect that Service Request 6.23 (Update Security Credentials) is available in the role of Gas Supplier in respect of both SMETS1 and SMETS2 Devices, and the table in clause 8.1.11 of CTSD to reflect that Service Request 4.8.3 (Read Export Profile Data) is available in the role of Other User in respect of both SMETS1 and SMETS2 Devices.
10. Should stakeholders have any final comments on the changes set out above or the wider legal drafting of the documents, they should be submitted to BEIS in a response to this consultation letter.

Proposed date of designation

11. Subject to stakeholder comments, we propose to re-designate the amended CTSD and ETAD as Appendices R and J to the SEC respectively, through the draft direction at Annex H, on 8 March 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter).
12. Subject to stakeholder comments, we propose to approve the UTSAD, through the draft direction at Annex H, with effect from 8 March 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter).

Consultation questions

13. We would welcome views on:
 - i. The content within the versions of UTSAD, CTSD and ETAD at Annexes A-C not already consulted upon by DCC (with reference to the track change versions at Annexes E-G); and
 - ii. The proposed approval/re-designation date of 8 March 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the UTSAD, CTSD and ETAD through the draft direction at Annex H.

Responding to this consultation

14. Comments on these proposals should be submitted **by 17:00 on Friday 1 March 2019** to: smartmetering@beis.gov.uk or addressed to:

Smart Metering Implementation Programme – Delivery,
Department for Business, Energy & Industrial Strategy,
2th Floor, Spur
1 Victoria Street,
London SW1H 0ET

15. Information provided in response to this consultation, including personal data, may be subject to publication or release to other parties, or to disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004).
16. The individual responses to this consultation may be published and you should therefore let us know if you are not content for your response or any part of it to be published. If you indicate that you do not want your response published, we will not publish it automatically but it could still be subject to information requests as detailed above. If you do not want your individual response to be published, or to otherwise be treated as confidential, please say so clearly in writing when you send your response to the consultation. For the purposes of considering access to information requests, it would also be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.
17. We intend to place a summary of responses on the SEC website.

Yours sincerely,



Duncan Stone
Head of Delivery
Smart Metering Implementation Programme

List of Annexes to this letter

- Annex A:** User Testing Services Approach Document (Clean version) [Separate Document]
- Annex B:** Common Test Scenarios Document (Clean version) [Separate Document]
- Annex C:** Enduring Testing Approach Document (Clean version) [Separate Document]
- Annex D:** DCC Report on UTSAD consultation that was submitted to the Secretary of State [Separate Document]
- Annex E:** User Testing Approach Document (Track changed version) [Separate Document]
- Annex F:** Common Test Scenarios Document (Track changed version) [Separate Document]
- Annex G:** Enduring Test Approach Document (Track changed version) [Separate Document]
- Annex H:** Draft Direction [Below]

ANNEX H

Direction and designation

This direction is made for the purposes of the smart meter communication licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the "DCC Licence") and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the "SEC").

Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

1. Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from **[DATE]**, the **Common Test Scenarios Document** previously designated and incorporated into the SEC as Appendix R is hereby re-designated and incorporated in the form set out in **Annex [TBC]** of this direction.
2. Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from **[DATE]**, the **Enduring Testing Approach Document** previously designated and incorporated into the SEC as Appendix J is hereby re-designated and incorporated in the form set out in **Annex [TBC]** of this direction.
3. Pursuant to clause 3.4 of the Appendix AK (SEC Variation Testing Approach Document for SMETS1 Services) to the SEC, the Secretary of State hereby directs that the User Testing Services Approach Document for SMETS1 Services is approved in the form set out in **Annex [TBC]** to this direction.

For the avoidance of doubt such re-designation of the Common Test Scenarios Document and the Enduring Testing Approach Document shall be without prejudice to anything done under the DCC Licence or the SEC on or after these documents first being designated, or to the continuing effectiveness of anything done under these documents prior to their re-designation (which shall have effect as if done under the re-designated documents).

This direction is also being notified to the SEC Administrator.