

Common Testing Scenarios Document Enduring Testing Approach Document User Testing Services Approach Document

Post-Consultation Report to Secretary of State

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1 Introduction

In the initial stages of the smart meter roll-out across Great Britain, several Energy Suppliers installed first generation smart devices (known as SMETS1 Devices) in consumers' homes. These meters currently operate outside of DCC's service. They are supported by a variety of systems, with each energy supplier taking a different approach. While this initial roll out has driven out early learnings and benefits, SMETS1 meters installed by one energy supplier are not always supported by another's systems. This sometimes results in consumers losing their smart functionality when they switch energy suppliers.

In addition to the changes made by the Secretary of State to Section H14 of the Smart Energy Code (SEC) and the designation of the SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) in September 2018 as SEC Appendix AK, we have developed a User Testing Services Approach Document (UTSAD) as part of a suite of documents which sit under the SVTAD. The UTSAD sets out the rights and obligations of DCC and users in the User Testing Services (UTS) Test Phase. Wherever it has been possible, we have aligned the design of SMETS1 Services with existing SMETS2+ services.

To support the rights and obligations set out in the UTSAD and to support the extension of DCC's enduring testing services to support SMETS1, a range of SMETS1 specific changes were introduced to two SEC Subsidiary Documents (SSDs): These were:

- the Enduring Test Approach Document (ETAD) which is Appendix J to the SEC; and
- the Common Test Scenarios Document (CTSD), which is Appendix R to the SEC.

2 Consultation and Responses Received

In on 24 August 2018. we consulted on a draft of the SMETS1 UTSAD and change to the ETAD and CTSD in accordance with Section X11 of the SEC with a view to incorporating it into the SEC in addition to complimentary changes made by the Secretary of State to section H14 of the SEC.

The consultation ran for 4 weeks and closed on 21 September 2018. We have followed the process as set out below in developing the SMETS1 UTSAD, CTSD and ETAD:

- discussed procedures and requirements in testing forums with industry;
- consulted on the regulatory version of the SMETS1 UTSAD and consequential changes to the ETAD and CTSD;
- addressed consultation responses;
- circulated work-in-progress regulatory drafts to BEIS for discussion;
- formally, publicly consulted on the regulatory draft;
- collated and reviewed consultation feedback; and
- produced, amended and assured drafts for submission to Secretary of State

We received comments in writing from 12 separate parties which include Distribution Network Operators (DNOs), Managed Service Providers ((MSPs) also referred to as Adaptor Providers) and Energy Suppliers. The comments were primarily in response to the consultation questions and also included additional comments provided by 9 of the 12 respondent parties on issues or queries not directly related to consultation questions.



3 Summary of Disagreements that arose during consultation

A full consultation summary setting out all comments received, and DCC's responses to them, are submitted alongside this report. These set out the nature of consultation responses and DCC's conclusions in light of them. In summary, disagreements that arose during the consultation related to the following areas:

3.1 Reliance on managed service provider systems

Some respondents disagreed with DCC's proposals for using equivalence, or the reliance on Manager Service Providers' systems when exiting from SMETS1 Interface Testing. It is DCC's view that the proposals are merited as they reflect the approach being followed in SMETS2 testing and recognise the current arrangements in industry, with many DCC Users relying on Managed Service Providers to connect to DCC Systems.

3.2 Completeness of Services Requests and Alerts in the CTSD

Some respondents did not agree with the proposed list of Service Requests and Alerts set out in the draft CTSD to reflect the necessary SMETS1 testing that was required. We have introduced a number of Alerts into the CTSD based on respondents' comments, but not all, on the basis that the purpose of Alert Testing is to ensure the Testing Participant is capable of receiving that particular Alert-type, as opposed to each and every Alert variant.

3.3 Restrictions on PPCT and Defining changes to DMCs

One respondent did not agree with DCC's proposal to restrict Testing Participants' access to PPCT so that it was only available for changes to Device Model versions that were already part of an entry on the EPCL. Another did not support the premise that what constituted a new DMC should be any instance where there was a change to the Firmware variant of an existing hardware variant. DCC considers that PPCT will provide an essential means to mitigate against interchangeability issues, and it has been designed as a quick-to-complete testing process on the basis that it will need to be regularly used. We consider the restrictions around its availability to be in accordance with the policy intent for the cessation of SMETS1 equipment use.

DCC recognises the need for possible amendments in the ETAD relating to the PPCT process where PPCT needs to be fast tracked (or even bypassed) on security grounds. Potential changes to give effect to requirements to support this process will need to be discussed with stakeholders, and so we propose to consult on revisions and bring forward further changes to ETAD in due course.

4 UTSAD, CTSD and ETAD – fitness for purpose

DCC is confident that the revised drafts of the UTSAD, CTSD and ETAD, submitted to the Secretary of State reflect the requirements for the documents as are set out in the SEC (in the case of the UTSAD, in the SEC Variations Testing Approach Document for SMETS1 Services). DCC has had significant consultation and interaction with industry in the development of the documents and we have, where necessary, addressed the comments that have been received from industry and sought additional feedback made by respondents.



It is DCC's view that it has met its SEC obligation to consult with parties and to address the points raised and those that have not been resolved in line with the purpose of the document. Moreover, that it has met its regulatory obligation in this regard.

Each of the UTSAD, the CTSD and the ETAD are in line with the overall solution design and testing arrangements for the SMETS1 Service and other relevant documents.

DCC considers each document is defined to a sufficient level of detail for incorporation into the SEC. The documents provide an overarching framework which sets out clearly and unambiguously parties' rights and obligations which are consistent / and aligned with the rest of draft SEC requirements in relation to SMETS1 Services.

It is DCC's view that the documents deliver the regulatory requirements specified in the SEC and the Licence, are materially complete, and the content of each is technically accurate.

5 Next Steps

Following the submission of the documents to the Secretary of State, DCC expects the Secretary of State to make a decision on whether and when to incorporate this document into the regulatory framework.