



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

13 March 2019

Dear Colleague,

**Government response to the January 2019 consultation on re-designation of the CPL Requirements Document, and to the February 2019 consultation on re-designation of the Enduring Test Approach Document (ETAD) and the Common Test Scenarios Document (CTSD) and approval of the User Testing Services Approach Document for SMETS1 Services (UTSAD), and related directions**

1. On 21 January 2019, following consultation with stakeholders, BEIS published its conclusions<sup>1</sup> on proposed amendments to the Smart Energy Code (SEC), a number of SEC Subsidiary Documents (SSDs) and the energy supply licence conditions. These changes were primarily intended to enable the provision of a SMETS1 Service by the Data Communications Company (DCC), and to move away from the automatic removal of SMETS2 Device Models from the Central Products List (CPL) if their Commercial Product Assurance (CPA) certificate expires or is withdrawn.
2. In publishing our consultation conclusions, we issued a further consultation on the proposed re-designation date of 11 March 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) from which the amended CPL Requirements Document would be incorporated into the SEC as Appendix Z. The amended version of the CPL Requirements Document that was proposed for re-designation sets out the process for addition of SMETS1 Device Models to the CPL, and changes relating to the expiry or withdrawal of CPA certificates in respect of SMETS2 Device Models.
3. Separately, on 11 February 2019 BEIS issued a consultation<sup>2</sup> on approval of the UTSAD and incorporation into the SEC of the amended ETAD and CTSD with effect from 8 March 2019, or as soon as reasonably practicable within one month

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<sup>1</sup> See: <https://smartenergycodecompany.co.uk/latest-news/government-response-to-5-november-2018-consultation-on-regulatory-changes-related-to-the-provision-of-a-dcc-smets1-service-and-changes-to-the-cpa-and-cpl-management-process-for-smets2-devices-and-co/>

<sup>2</sup> See: <https://smartenergycodecompany.co.uk/latest-news/beis-consultation-approval-user-testing-services-approach-document-smets1-services-utsad-re-designation-enduring-test-approach-document-etad-common-test-scenarios/>

thereafter. All three documents had been submitted to BEIS by the DCC following consultation with stakeholders.

4. This letter sets out the Government response to both consultations and directs the approval of the UTSAD, and the incorporation of the amended versions of ETAD, CTSD and CPL Requirements Document into the SEC from today, 13 March 2019. The version of the UTSAD that is being approved and the amended versions of ETAD and CTSD that are being incorporated into the SEC are included at Annexes A, B and C to this letter respectively, and contain a small number of changes to the versions that were published as part of our February consultation, such changes having been made in response to comments received (and which are described in further detail below). These amendments are also shown in tracked changed versions of the documents attached at Annexes D, E and F. The version of the CPL Requirements Document that is being incorporated into the SEC is included at Annex G.

#### **Government response to the February 2019 consultation on approval of the UTSAD, and re-designation of the ETAD and CTSD**

5. The consultation on approval of the UTSAD, and re-designation of the ETAD and CTSD closed on 1 March. A total of four responses were received from three energy suppliers and the DCC.

#### Government response to comments on content of the draft UTSAD, ETAD and CTSD

6. In response to our consultation letter of 11 February a number of respondents provided comments on the content of the proposed UTSAD, ETAD and CTSD, which are summarised below, together with our responses to them.

#### *Test sequencing*

7. One respondent noted that the ETAD stipulates in several places (e.g. clauses 7.1(b), 8.3 and 8.4(c)) that the DCC would provide test participants with two Device Model Combinations (DMCs) that are on the SMETS1 Eligible Product Combinations list (EPC) for the purposes of SMETS1 Eligibility Testing and Device and User System Tests (DUST). They note, however, that BEIS only intends to approve the addition of DMCs to the EPC at go-live for the relevant capability release, by which time Users should have already commenced Eligibility Testing and DUST. As a consequence, the respondent considered that a number of amendments to the ETAD were required.
8. We would draw stakeholders' attention to clause 4.6(d) of the UTSAD, which varies clauses 7.1(b), 8.3 and 8.4(c) of the ETAD so that prior to DMCs being added to the EPC, the obligation on the DCC is to provide DMCs against which Systems Integration Testing (SIT) has successfully completed (or, where SIT has not completed, DMCs against which all relevant SIT tests have been successfully concluded).

*Process for the DCC to decide if a new DMC requires testing prior to addition to the EPC*

9. One respondent raised a concern about the process for the DCC to decide if a new DMC requires testing prior to addition to the EPC. While the respondent acknowledged that there may be a need for the flexibility for the DCC to decide to add a new DMC to the EPC without undertaking testing on that DMC, they proposed an additional requirement on the DCC to keep an audit trail of how any such decisions are taken that could be referred back to if required.
10. BEIS agrees that the DCC should be required to keep an audit trail of its rationale for such decisions. We have therefore included new drafting at clause 9.6(a) of the ETAD to reflect this obligation.

*Changes to the testing environment*

11. UTSAD clause 5.1 stipulates that the DCC will advise Testing Participants if any tests need to be re-run in circumstances where the DCC makes changes to the testing environment in which they are undertaking Eligibility Testing. One respondent suggested that the DCC should consult with Users before any changes are made, and consider any cost or timescale impacts on Users before proceeding with any such changes.
12. BEIS accepts the reasoning outlined by the respondent and agrees that DCC should discuss the timing of any proposed changes to the testing environment with any Testing Participants that are undertaking testing in that environment prior to making any changes. New drafting has been included at clause 5.1 of the UTSAD to include such an obligation, and to require the DCC to take the views of Testing Participants into account.

*Testing Advisory Group (TAG) visibility of the SMETS1 Interface Testing Completion Report*

13. One respondent's interpretation of clause 6.3(c) in the UTSAD was that TAG will only be able to review a redacted version of the SMETS1 Interface Testing Completion Report. The respondent wanted to confirm whether their interpretation of the provision is correct, and, if so, understand the rationale for this.
14. BEIS can confirm, following engagement with the DCC, that TAG will be provided with an unredacted copy of the SMETS1 Interface Testing Completion Report (save for any anonymisation that the DCC considers necessary to protect the identity of Testing Participants). The version of the Completion Report that is published to SEC Parties, however, may be redacted at the direction of the SEC Panel pursuant to clause 6.6.

*Further amendments to CTSD*

15. The DCC responded to the consultation requesting two further amendments to the CTSD.

16. Tables 8.1.13 and 8.1.14 of the CTSD, which reference Device Alerts for the Import Supplier and the Gas Supplier, refer to alert 0x8F32. DCC noted that where the Device being used in testing is not able to support the generation of this Alert, the DCC will need to notify the relevant Testing Participant of a different Alert that needs to be tested. We have added a note to this effect to the tables at both clause 8.1.13 and clause 8.1.14.
17. The DCC additionally noted a typographical error in table 8.1.26 (Response Code Alerts). The alert labelled “E63” should instead have been labelled “E61”. We have amended the reference included in the table accordingly.

#### Government response to comments on the proposed designation and approval date

18. One respondent expressed their agreement with the proposed designation date and one respondent expressed concern that the timing of designation is already late, given that Eligibility Testing for the Initial Operating Capability (IOC) cohort is due to start on 18 March 2019. They therefore requested that re-designation takes place as soon as possible. No respondents opposed the proposed dates for approval of the UTSAD, and re-designation of the ETAD and CTSD.
19. Consequently, we have concluded that it is appropriate to approve the version of the UTSAD attached at Annex A, and to incorporate the amended versions of ETAD and CTSD attached at Annexes B and C respectively into the SEC, on 13 March 2019.

#### **Government response to January 2019 consultation on re-designation of the CPL Requirements Document**

20. The consultation on re-designation of the CPL Requirements Document closed on 4 February and we received two responses, both of which came from energy suppliers. Both respondents agreed with the proposed re-designation date and associated direction, and no further comments were provided. We have therefore concluded that it is appropriate to incorporate the version of the CPL Requirements Document attached at Annex G into the SEC from today, 13 March 2019.
21. In addition, we can confirm that the wider amendments to the main body of the SEC and energy supply licence conditions that were concluded upon on 21 January 2019 have now been brought into effect following completion of the necessary Parliamentary process. The amendments to the DCC User Interface Services Schedule (UISS) which were concluded upon on the same date have been now baselined at TBDG and are available from the Developing SEC section of the SEC website.<sup>3</sup> We intend to consult on bringing this baselined version of UISS – and other SEC Subsidiary Documents in the TBDG baseline – into legal effect in advance of DCC’s SMETS1 Service being made available.

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<sup>3</sup> See: <https://smartenergycodecompany.co.uk/the-developing-sec/>

## 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.

- a) 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 13 March 2019, 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 C to this direction.
- b) 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 13 March 2019, 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 B to this direction.
- c) 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 13 March 2019, the CPL Requirements Document previously designated and incorporated into the SEC as Appendix Z is hereby re-designated and incorporated in the form set out in Annex G to this direction.
- d) 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 A to this direction.

For the avoidance of doubt such re-designation of the Common Test Scenarios Document, the Enduring Testing Approach Document and the CPL Requirements 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.

Yours faithfully,



**Duncan Stone**

Head of Delivery

Smart Metering Implementation Programme

(an official of the Department for Business, Energy & Industrial Strategy authorised to act on behalf of the Secretary of State)

**List of Annexes to this letter (annexed as separate documents)**

- Annex A:** User Testing Services Approach Document for SMETS1 Services (approved version)
- Annex B:** Enduring Testing Approach Document (designation version)
- Annex C:** Common Test Scenarios Document (designation version)
- Annex D:** User Testing Services Approach Document (tracked changed version)
- Annex E:** Enduring Testing Approach Document (tracked changed version)
- Annex F:** Common Test Scenarios Document (tracked changed version)
- Annex G:** CPL Requirements Document (designation version)