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

14 June 2019

Dear Colleague,

Approval of the Migration Test Approach Document for SMETS1 Services and re-designation of the SEC Variation Testing Approach Document for SMETS1 Services

On 15 April 2019 the DCC published a consultation[1] on a new Migration Testing Approach Document (MTAD) for a SMETS1 service and associated amendments to the SEC Variation Testing Approach Document for SMETS1 Services (SVTAD) in support of testing of the migration solution for a SMETS1 service. The MTAD is produced pursuant to Clause 3.1 - 3.3 of the SMETS1 SVTAD and the SMETS1 SVTAD was produced pursuant to Section X11.6 of the SEC. The consultation closed on 7 May and 12 responses were received by DCC. DCC published its response[2] on 10 June 2019. The DCC has now submitted the draft MTAD for approval and the updated SMETS1 SVTAD to BEIS for re-designation, together with its consultation conclusions and copies of the responses received from stakeholders.

The comments received by the DCC were broadly supportive of the proposed test approach; however we note that concerns were raised notably on the time taken by DCC to produce the MTAD, the misalignment with the commencement of migration testing and a lack of supporting documentation, alongside a number of specific issues and clarifications.

As part of its consultation, the DCC consulted on behalf of BEIS on a proposed date for approval and re-designation of the documents of Friday 24 May 2019 or, if necessary, as soon as reasonably practicable within one month thereafter. We note that DCC received 10 responses on this matter, with 7 of those offering support or caveated support for the approval date. Those opposing the date noted concerns consistent with those raised more broadly on the test approach document highlighted above. An additional concern raised by one respondent suggested there was an

[1] See: https://www.smartdcc.co.uk/smart-future/enrolment-and-adoption/consultation-and-supporting-information/
[2] See: https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/mtad-consultation-response/

insufficient length of consultation period. One respondent also called for BEIS to consult again on the designation date.

We note that the DCC has responded to concerns raised in its response document and revised MTAD and that it held a stakeholder teleconference on Thursday 6 June 2019 to discuss key outcomes from the consultation, its proposed response and to obtain further stakeholder views. We have communicated with DCC our expectation that for future SMETS1 capability releases, consultation on the approach to testing is concluded ahead of that test phase beginning. We also note that DCC provided TAG its paper on the scope and breadth of migration testing, as well as on the scope of regression testing and it is our understanding that this is aligned with the MTAD submitted to us. We would further note that:

1. The DCC has subsequently confirmed that the automatic process for the application of DNO certificates to a device will fall within the scope of Migration Testing
2. When the MDUST user guide is issued, should it show that any further changes to the MDUST provisions in MTAD are required, that DCC would need to progress such changes quickly ahead of providing the service, though this is scheduled post IOC.
3. We have amended the version of the SVTAD submitted to us to remove references to testing of migration 'processes' to be consistent with its treatment in the MTAD. We note that DCC explained the rationale for this, in terms of these processes being considered as part of Business Acceptance Testing/Operational Acceptance Testing, on the stakeholder call referred to above.

We have concluded that it is appropriate to approve the MTAD (as at **Annex A**) and re-designate the revised SMETS1 SVTAD (as at **Annex B**) today, 14 June 2019. A tracked changed version of the SMETS1 SVTAD is included at **Annex C** to highlight the changes made to the document from the version previously in legal effect.

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.

*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 Migration Test Approach Document for SMETS1 Services is approved in the form set out in **Annex A** to this direction.*

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 14 June 2019, the SEC Variation Test Approach Document for SMETS1 Services previously designated and incorporated into the SEC as Appendix AK is hereby re-designated and incorporated in the form set out in ***Annex B*** *to this direction.*

For the avoidance of doubt such re-designation shall be without prejudice to anything done under the DCC Licence or the SEC on or after the SEC Variation Test Approach Document for SMETS1 Services first being designated or to the continuing effectiveness of anything done under the SEC Variation Test Approach Document for SMETS1 Services prior to this re-designation (which shall have effect as if done under the re-designated SEC Variation Test Approach Document for SMETS1 Services).

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

Annex A: Migration Testing Approach Document for SMETS1 Services (approved version)

Annex B: SEC Variation Test Approach Document for SMETS1 Services (approved version)

Annex C: SEC Variation Test Approach Document for SMETS1 Services (tracked changed version against previous version in legal effect)