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# MP080 'Managing DUIS uplifts'

## Modification Report Version 1.0



## About this document

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This document is a draft Modification Report. It provides detailed information on the background, issue, solution, costs, impacts and implementation approach. It also summarises the discussions that have been held and the conclusions reached with respect to this Modification Proposal.

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This document also has four annexes:

- **Annex A** contains the business requirements.
- **Annex B** contains the changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex C** contains the full Data Communications Company (DCC) Preliminary Assessment response.
- **Annex D** contains the full Refinement Consultation responses.

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## 1. Summary

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This Proposal was raised by Helen Metcalfe of the DCC.

The DCC User Interface Specification (DUIS) is contained in Smart Energy Code (SEC) Appendix AD. It sets out the technical details for how Users send and receive data from the DCC. Currently, all versions of the DUIS have no designated start or end dates. This means there are multiple versions of the DUIS existing that can't be removed from the SEC due to Users still currently using the earlier versions. This results in the DCC having to maintain the historical versions and expend additional testing costs against these. Additionally, only versions of DUIS v3.0 and higher can support both Smart Metering Equipment Technical Specification (SMETS) 1 and SMETS2 meters, meaning that in the event of a Change of Supplier (CoS), a SMETS 1 meter could lose “smart” functionality.

The Proposed Solution is to include all existing and future DUIS versions in the Technical Specification Applicability Table (TSAT). By allowing these versions to be end dated, it will allow the DCC to manage fewer versions of the DUIS and, in the long term, reduce testing costs.

All SEC Parties will be affected by this Modification Proposal. The proposed implementation date is as part of the November 2020 SEC Release, with DUIS versions 1.0 and 2.0 end-dated in November 2021.

## 2. Background

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### Why are there Multiple DUIS versions?

The DUIS is contained in SEC Appendix AD and sets out the technical details for how Users send and receive data from the DCC. All versions, both current and past, of the DUIS are contained within the SEC. When a new version is created, the old versions remain. This means that at any point in time different Parties can be using different versions of DUIS and therefore the DCC must maintain each historical version as well as the latest version.

Currently, there are four active versions of the DUIS alongside the supporting Message Mapping Catalogue (MMC) and Schema and Parse & Correlate (P&C) software versions, following the introduction of DUIS v3.1 as part of the November 2019 SEC Release. This will increase to a fifth version in the November 2020 SEC Release, with the potential for a new version of DUIS to be created every year.

The latest DUIS version always includes functionality introduced in earlier versions, so there is no functional benefit in continuing to maintain and support all previous versions. It was anticipated that Users would uplift to a new version shortly after this was made available. However, this has not occurred consistently, and some Users have not uplifted beyond the first version of the DUIS. Therefore, a process to manage DUIS uplifts and retire or 'end date' older or historic DUIS versions is needed.

### What is the issue?

Two main issues have been identified.

Firstly, Parties are incurring costs because the DCC is obligated to maintain all previous version of DUIS. Most notably this cost is incurred as part of regression testing for SEC Releases. Given that there are no functionality changes to previous DUIS, Parties are paying additional costs for confirming that the previous versions still operate satisfactorily even though they remain unchanged. In 2019, the DCC advised that there could be around a 10% reduction of Systems Integration Testing (SIT) time and costs if previous DUIS versions were removed from regression testing.

Secondly, a number of Users still use DUIS v1.1 or DUIS v2.0. Only versions 3.0 and above support both SMETS1 and SMETS2 meters. Therefore, Users who remain on DUIS versions 1.1 or 2.0 will not be able to communicate with SMETS1 meters. This creates a risk that impacts directly on Consumers, in that on a Change of Supplier (CoS) event a SMETS1 meter could lose some Smart functionality.

### 3. Solution

#### Proposed Solution

The MP080 solution has two parts:

- Listing the DUIS version applicability dates in the TSAT; and
- Mandating an uplift to DUIS version 3.0 or above.

The business requirements can be found in Annex A.

#### Moving the DUIS to the TSAT

The DUIS will be added to the TSAT. Within the TSAT each version of the DUIS will have a relevant start and end date applied.

There will be no rule introduced that requires a set lead time for applying end dates to DUIS versions. The start and end dates in the TSAT will be based upon industry consultation and the most appropriate dates applied on a case-by-case basis. It is however noted that Parties expect at least two versions of the DUIS to be supported at any one time.

The DUIS can only be amended by a Modification Proposal or a Government Department for Business, Energy and Industrial Strategy (BEIS) designation (during the transition). The Proposed Solution will amend the TSAT to include the DUIS and change the definition of the TSAT and anywhere it is referenced within SEC Section A 'Definitions and Interpretations' to reflect this.

Any BEIS designation that impacts the DUIS will need to include the required redline changes to the TSAT.

Listing the DUIS in the TSAT will ensure only relevant versions of the DUIS remain supported, reduce testing costs and it will be clear to all Parties when there would be a required transition to the latest DUIS version.

#### Mandating uplift to latest DUIS versions

Once the DUIS has been added to the TSAT, relevant start and end dates will be applied. It is proposed to apply the following dates in the TSAT upon implementation of this modification:

DUIS Version	Start Date	End Date
v1.1	21/07/2017	26/11/2021
v2.0	01/02/2018	26/11/2021
v3.0	28/07/2019	Not yet determined
v3.1	28/11/2019	Not yet determined

These changes would mandate that all Parties are using DUIS version 3.0 or above by 26 November 2021 and that both versions 3.0 and 3.1 are supported by the DCC until the dates in the table are amended in the future.

As new versions of DUIS are created in 2020, appropriate end dates will be determined for DUIS v3.0 and v3.1; these will be determined under separate modifications. For the avoidance of doubt it may not be necessary to end date DUIS v3.0 or v3.1 in 2021. However, should it be deemed appropriate to do so the required changes will be made to the TSAT under a corresponding modification.

As part of the solution, the DCC has expressed a desire to provide only a single DUIS impacting update a year, to be incorporated as part of SEC Release. This is expected to be the standard business-as-usual practice, but is not being mandated by this modification. However, if required the Technical Architecture and Business Architecture Sub-Committee (TABASC) can be consulted upon to request additional Release(s) to include DUIS impacting changes if the industry would benefit from an additional DUIS impacting Release.

## 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

Parties who still use DUIS v1.1 or v2.0 will be required to uplift to DUIS v3.0 or v3.1 by the 2021 November Release (26 November 2021).

### DCC System

There will be no impact on the DCC systems.

### SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section A 'Definitions and Interpretations'
- Schedule 11 'Technical Specification Applicability Tables'

The changes to the SEC required to deliver the Proposed Solution can be found in Annex B.

### Consumers

Whilst there is little impact directly on consumers, any reduced testing costs should come as a pass through to consumers. Any consumer who switches their energy supplier would benefit from a reduced risk of losing their "Smart" functionality when they switch Energy Supplier.

### Other industry Codes

There are no expected impacts on other industry codes.

### Greenhouse gas emissions

There are no expected impacts on greenhouse gas emissions.

## 5. Costs

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### DCC costs

The estimated DCC implementation costs to implement this modification is less than £50,000. There is no breakdown of cost as this was described as a one-off DCC-only cost that doesn't require any Design, Build or testing stages that would be associated with a DCC Systems change. This cost is for the removal of URLs as stated in Section 6 'Costs and Charges' of the Preliminary Assessment. There is no impact on the Service Providers.

More information can be found in the DCC Preliminary Assessment response in Annex C.

### SECAS costs

The estimated Smart Energy Code Administrator and Secretariat (SECAS) implementation costs to implement this modification is two days of effort, amounting to approximately £1,200. The activities needed to be undertaken for this are:

- Updating the SEC and releasing the new version to the industry.

### SEC Party costs

SEC Parties acknowledged there was no individual cost to them in this Modification Proposal. SEC Parties who were either planning to upgrade to DUIS v3.0+ or those already on DUIS v3.0+ both noted they would not be affected. One SEC Party noted that cost would be incurred when a new DUIS version is incorporated, but not directly as a consequence of this Modification Proposal.



## 6. Implementation approach

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### Agreed implementation approach

SECAS has agreed an implementation date of:

- **5 November 2020** (November 2020 SEC Release) if a decision to approve is received on or before 21 October 2020.

For the avoidance of doubt, this is the implementation date for the insertion of the DUIS Versions table into the Technical Specification Applicability Table. This table will state that the end date for DUIS v1.1 and DUIS v2.0 is **26 November 2021**.

The rationale for this implementation date is that the Proposed Solution's end dating will ensure, if this Modification Proposal is approved, that all SEC Parties are given one year to migrate to one of the more recent versions of the DUIS.

As part of the Refinement Consultation the respondents were asked whether they feel this period of one year to migrate is appropriate. All respondents who stated they were still using DUIS v1.1 or v2.0 stated that they were in favour of the one-year window and that the length would be sufficient. The full responses received can be found in Annex D.

## 7. Assessment of the proposal

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### Observations on the issue

The DCC stated that its desired outcome was that by November 2021, all SEC parties would have a version of DUIS that would be able to support and communicate with SMETS1 and SMETS2 meters. It believed this is the main reason for progressing this modification, to ensure smart functionality is not lost on CoS events. The DCC also stated that this solution would reduce the amount of supported DUIS versions, which would lead to a reduction in testing costs. It was observed that these cost savings would be minimal, due to service providers having automated these regression tests. This means any cost-savings will be incurred later on after the versions are removed, rather than from the point of inclusion into the SEC.

### Solution development

#### Enduring Solution

The Working Group discussed the concept of an enduring solution. This was raised initially by the Change Sub-Committee (CSC) and a member enquired into whether an enduring process could be incorporated into the Proposed Solution. The DCC suggested that as part of the solution, this should include an agreed process to amend the DUIS versions in the TSAT without requiring future SEC Modification Proposals.

SECAS suggested that there could be an alternate means of requesting and implementing changes to the TSAT without raising SEC Modification Proposals. Instead, the TSAT, which currently sits as a SEC Schedule, could be removed and made a code defined document. SEC Section A would have an amended definition for the TSAT and include a reference to the document. This would allow the Panel (or a delegated Sub-Committee) to amend the TSAT for any future changes that requires a new DUIS version or striking out an older and unsupported one.

When the Refinement Consultation was issued, the respondents weren't in favour of removing the TSAT from SEC Schedule 11, a stance that was echoed by the TABASC. This was due to a concern that the TSAT should be codified in the SEC and that removing it would remove transparency from the process. It was instead suggested that any future SEC modification should include changes to the TSAT as part of the legal text which either creates or end-dates a DUIS version. This would remove the need for modifications specifically created to introduce and end-date DUIS versions, as they could instead be included as part of DUIS impacting modifications.

#### Frequency of DUIS versions

As part of the enduring approach, questions were raised about the frequency of introducing new DUIS versions. The DCC has been told by its customer base that they would appreciate a single DUIS version update every year. This update would be part of a SEC Systems Release (recently the one scheduled in November every year), which also includes the DCC System impacting changes that change the Technical Specifications. This also raised the query of whether a third iteration of the DUIS could be supported at one time, rather than two being live at any one time post November 2021. These topics were suggested for inclusions as additional questions in the Modification Proposal's Refinement Consultation.

One concern raised was that this concept of introducing a single DUIS update annually conflicts with the SEC Release Management Policy. This policy states that DCC is obligated to have two SEC System Releases a year. They offered a suggestion that a process could be created which is used in other Codes where SEC Parties are advised when a release isn't happening. This was so that if the DCC is attempting to deliver only a single DUIS update a year, that this aligns with what happens in other Codes and that it doesn't conflict with other existing policy and documentation.

SECAS highlights that while there are two SEC Systems Releases a year, these are for any changes that impact the DCC Systems; not all such changes impact the DUIS. The policy (version 3.0) states that whilst there are two SEC Systems Releases per year, the Panel notes the impact that changes to the DUIS, the GB Companion Specification (GBCS) and the Technical Specifications can have on SEC Parties. Therefore, the Panel will endeavour to limit such changes to one of the SEC Systems Releases per year, noting that such decisions will take into consideration the efficiency, urgency and cost of each proposal. The policy also allows for a SEC Systems Release to be converted to a SEC Documentation Release, if this is communicated well in advance.

### **Change of Preliminary Assessment**

The Preliminary Assessment and the design of the Proposed Solution has changed throughout the Refinement Process. Originally, the first Preliminary Assessment returned an “over-specified” solution which cost in excess of £500,000 up to Pre-Integration Testing (PIT) and required potential Communications Service Provider (CSP) and Data Service Provider (DSP) changes. After feedback from SECAS, the DCC undertook a second Preliminary Assessment that addressed the same business requirements but returned a less technical and less expensive solution. This request returned the current Preliminary Assessment (see Annex C) which costs “up to £50,000” according to the assessment, and containing no DCC Systems impacts in the solution. As there is no DCC Systems impact, the DCC confirmed a full Impact Assessment was not required.

### **Additional questions in the Refinement Consultation**

To help assess the solution and ensure it addresses the concerns of industry, additional questions were added to the Refinement Consultation. Respondents were asked if they use an older iteration of DUIS and if the Proposed Solution with a year between moving DUIS versions to the TSAT is an appropriate time period to ensure a full migration to the newer versions of DUIS. Another Refinement Consultation question asked about the preferred frequency of DUIS updates if this Modification Proposal were to be accepted.

## **Support for Change**

### **The TABASC**

When taken to the TABASC in the Development Stage, the Modification Proposal was supported. The TABASC Chair noted the desire for an enduring solution and whether it could avoid using future modifications to change the proposed DUIS table in the TSAT.

When the Modification Proposal was later returned during the Refinement Stage, SECAS and the Proposer had suggested that the TSAT could be lifted from SEC Schedule 11. This way, if the DUIS table was added to the TSAT, it would no longer require SEC modifications to amend the table. The

TSAT would become a 'code defined document' for which any changes would need to be consulted upon before being approved by the TABASC.

The TABASC disagreed with this approach, believing that industry needs good visibility of any changes to the DUIS and any other technical specification that would be started or end-dated in the TSAT. One TABASC member suggested that the introduction and end dating of a DUIS version could be included as part of a SEC modification that affects those areas. SECAS and the Proposer agreed to incorporate this into the solution and if it was the preferred approach of the TABASC then it made sense to make this change. The TABASC confirmed it was supportive of the rest of the proposed changes under this Modification Proposal.

### **The Working Group**

The Modification Proposal was taken to a Working Group meeting where all of the members felt the Proposed Solution had significant benefits. The area of the solution with the largest support was around ensuring the rest of industry had moved to the most recent versions of DUIS. These are the only versions that can support and communicate with both SMETS1 and SMETS2 Devices. The Working Group acknowledged the cost savings that could be made through the Modification Proposal but agreed that it alone would not have been a sufficient reason for change given it only allows for modest savings on regression testing costs.

## **Views against the General SEC Objectives**

### **Proposer's views**

The Proposer believes this Modification Proposal better facilitates General SEC Objectives (a)<sup>1</sup> and (g)<sup>2</sup>.

They believe SEC Objective (a) is better facilitated by improving the provision and operation of smart metering Devices at consumer premises. This is by ensuring that SEC Parties uplift their versions of the DUIS to a version that can communicate with both SMETS1 and SMETS2 meters. This will reduce the likelihood of operational issues.

They believe SEC Objective (g) is better facilitated by making the implantation of the SEC a more efficient process. With fewer versions of the DUIS to support and test against, this will reduce resources managing older documents and in testing scenarios for SEC Releases.

### **Industry views**

The views of industry were sought as part of the Refinement Consultation. Respondents was mostly supportive of the Modification Proposal, with all of the respondents believed that SEC Objectives (a) and (g) were better facilitated.

Some respondents did note an issue with the proposed removal of the TSAT from SEC Schedule 11. Respondents felt this was outside the original scope of the Modification Proposal and that they wouldn't feel comfortable with the TSAT not sitting in the SEC. Those who disagreed with this part of

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<sup>1</sup> Facilitate the efficient provision, installation, operation and interoperability of smart metering systems at energy consumers' premises within Great Britain

<sup>2</sup> Facilitate the efficient and transparent administration and implementation of the SEC

the solution believed that this Modification Proposal should still proceed as long as the solution was revised to keep the TSAT in SEC Schedule 11

The full Refinement Consultation responses can be found in Annex D.

## Appendix 1: Progression timetable

SECAS plans to take the Modification Proposal to the Panel on 17 April 2020 for approval. If the Panel agrees, a Modification Report Consultation will be issued before the Modification Report is presented to the Change Board to vote for on a decision to approve the proposal.

Progression Timetable	
Action	Date
Draft Proposal raised	6 Aug 2019
Presented to CSC for initial comment	27 Aug 2019
Presented to CSC for final comment and recommendations	24 Sep 2019
Panel converts Draft Proposal to Modification Proposal	11 Oct 2019
Business requirements developed with DCC	21 Oct 2019
Preliminary Assessment requested	18 Nov 2019
Preliminary Assessment returned	17 Jan 2020
Modification discussed with Working Group	5 Feb 2020
Refinement Consultation	17 Feb – 6 Mar 2020
Modification discussed with TABASC	2 Apr 2020
Modification Report approved by Panel	17 Apr 2020
Modification Report Consultation	20 Apr – 11 May 2020
Change Board Vote	27 May 2020

## 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	Government Department of Business, Energy and Industrial Strategy
CoS	Change of Supplier
CSP	Communications Service Provider
DCC	Data Communications Company
DSP	Data Service Provider
DUIS	DCC User Interface Specification
MMC	Message Mapping Catalogue
P&C	Parse & Correlate
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SIT	Systems Integration Testing
SMETS	Smart Metering Equipment Technical Specifications
TABASC	Technical Architecture and Business Architecture Sub-Committee
TSAT	Technical Specifications Applicability Table



## Smart Energy Code

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# MP080 ‘Managing DUIS uplifts’

## Annex A

# Business requirements – version 1.0

### About this document

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This document contains the business requirements for this Modification Proposal. It provides detailed information on the business requirements for the Proposed Solution agreed by the Proposer with input from the Data Communications Company (DCC) and Sub-Committees. It also provides the considerations and assumptions for each business requirement with respect to this Modification Proposal.

## 1. Business requirements

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This section contains the functional business requirements. Based on these requirements a full solution will be developed.

Business Requirements	
Ref.	Requirement
1	DUIS will be placed into the TSAT document under the SEC
2	End dates for DUIS versions within TSAT will be set as part of a relevant modification after consultation
3	The end dates for DUIS v1.0 and v2.0 (i.e. when they will stop being supported) will be 26 November 2020
4	The end dates for DUIS v3.0 and v3.1 will become TBC on implementation of MP080
5	Any further changes to DUISv3.0 or v3.1 end dates will require a separate Modification

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# MP080 ‘Managing DUIS uplifts’

## Annex B

### Legal text – version 1.0

#### About this document

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

## Section A ‘Definitions and Interpretations’

These changes have been prepared against Section A version 8.0.

### Amend Section A3.33 as follows:

#### The TS Applicability Tables

A3.33 There shall be a document to be known as the “**TS Applicability Tables**”, which shall be set out at Schedule 11 to the Code following its initial designation in accordance with Section X5 (Incorporation of Certain Documents into this Code) by the Secretary of State in reliance on Section X5.4 (Other Technical Specifications), and shall:

- (a) in relation to each Technical Specification, list each of the Versions of that Technical Specification that have been produced;
- (b) in relation to each such Version of that Technical Specification, identify:
  - (i) any Installation Start Date that has been assigned to it;
  - (ii) in the case of each Version of the SMETS with a Principal Version number of 1, the General Installation End Date that has been assigned to it;
  - (iii) in the case of each other Version of the SMETS, any Installation End Date that has been assigned to it (or a statement that no such date has yet been determined);
  - (iv) the Maintenance Start Date;
  - (v) the Maintenance End Date (or a statement that no such date has yet been determined);
  - (vi) the relevant Version(s) of the GBCS;
  - (vii) any Applicability Period relating to any such relevant Version of the GBCS; ~~and~~

(c) in relation to each Version of the GBCS, identify the relevant Version(s) of the CPA Security Characteristics; ~~and~~

(d) In relation to each version of the DUIS, identify:

(i) the date from which that version becomes applicable; and

(ii) the date after which that version ceases to be applicable (or a statement that no such date has yet been determined).

A3.34 The TS Applicability Tables shall be amended to ensure that it remains accurate and up-to-date:

- (a) on the designation or re-designation of a Technical Specification or the GBCS in accordance with Section X5 (Incorporation of Certain Documents into this Code), by the Secretary of State in reliance on Section X5.6 (Supplementary Provisions); and

- (b) as part of any modification of the Code which creates a new Version of any Technical Specification or of the GBCS in accordance with Section D (Modification Process).
- A3.35 Where the TS Applicability Tables is amended (including by the means described in Section A3.34) the amendment may have retrospective effect, which is to say that any date specified in the TS Applicability Tables by virtue of that amendment may be a date which falls before the date on which the amendment was made.
- A3.36 The information set out in the TS Applicability Tables shall be regarded as conclusive for all purposes of any question as to the:
- (a) Installation Validity Period of any Version of a Technical Specification other than in any case where both:
    - (i) it is a Version of the SMETS with a Principal Version number of 1; and
    - (ii) a Derogation has been granted to any Supplier Party in accordance with Section A4 (Derogation from SMETS1 General Installation End Date), and has not been revoked, specifying an Alternative Installation End Date in respect of that Version of the SMETS;
  - (b) Maintenance Validity Period of any Version of a Technical Specification;
  - (c) relevant Version(s) of the GBCS in relation to any Version of a Technical Specification;
  - (d) Applicability Period of any Version of the GBCS; ~~and~~
  - (e) relevant Version(s) of the CPA Security Characteristics in relation to any version of the GBCS; ~~and~~
  - ~~(e)~~(f) relevant supported version(s) of the DUIS.

## Schedule 11 'Technical Specification Applicability Table'

Add the following Table:

**Table 5 DUIS**

<u>DUIS Version</u>	<u>Start Date</u>	<u>End Date</u>
<u>v1.1</u>	<u>21/07/2017</u>	<u>26/11/2021</u>
<u>v2.0</u>	<u>01/02/2018</u>	<u>26/11/2021</u>
<u>v3.0</u>	<u>28/07/2019</u>	<u>TBC</u>
<u>v3.1</u>	<u>28/11/2019</u>	<u>TBC</u>

# **SEC Modification Proposal, SECMP0080**

**Ensuring a Managed Move to DUIS Version 3.0 or later (Managing DUIS Uplifts)**

**Preliminary Impact Assessment (PIA)**

<b>Version:</b>	<b>0.2</b>
<b>Date:</b>	<b>3<sup>rd</sup> February 2020</b>
<b>Author:</b>	<b>DCC</b>
<b>Classification:</b>	<b>DCC PUBLIC</b>

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# 1 Document History

## 1.1 Revision History

Revision Date	Revision	Summary of Changes
January 2020	0.1	Initial version, internal DCC review
3/02/2020	0.2	2 <sup>nd</sup> version, Proposer and SECAS review, DCC Design Authority review

## 1.2 Associated Documents

This document is associated with the following documents:

Ref	Title and Originator's Reference	Source	Issue Date
1	SECMP0080-Business-Requirements	SECAS	29/11/2019

## 1.3 Document Information

The Proposer for this Modification is Helen Metcalfe of SmartDCC. The original proposal was submitted on 6<sup>th</sup> August 2019.

The Preliminary Impact Assessment was requested of DCC on 20<sup>th</sup> November 2019. A first Preliminary Assessment was provided in January 2020. Following liaison with the SEC MOD Proposer, a second Preliminary Assessment is now provided, for consideration at the SECAS Working Group session on 5<sup>th</sup> February.

The title of the Modification was originally "Ensuring a managed move to DUIS version 3.1" and all records are retained under that title on the SECAS website. However the working title for the Modification is now "Managing DUIS Uplifts" as it includes future DUIS changes.

## 2 Executive Summary

### 1. This preliminary assessment recommends:

- Remove DUIS V1.1 and DUIS V2.0 with effect from November 2021;
- Removal to be zero or minimal cost with no technical or system change, simply removal of these versions from the SEC Document;
- DUIS Versions within the SEC to be included within Technical Specification Applicability Tables which will state an associated validity period.

### BACKGROUND

2. At the time of writing, there are four active versions of the DCC User Interface Specification (DUIS) and Schema alongside the supporting Message Mapping Catalogue (MMC) and Schema and Parse and Correlate (P&C) software versions. Of these, only one version, DUIS V3, supports DCC Services for both SMETS 1 and SMETS 2 meters. (The latest DUIS<sup>1</sup> always includes functionality introduced in earlier versions, so there is no functional benefit to any DCC Customer resulting from DCC continuing to maintain and support all previous versions.)
3. The reasons for putting forward this SEC Modification Proposal are threefold:
  - a. Firstly, many DCC Customers still have early or transitional DUIS Software (DUIS 1.1 and DUIS 2) versions that do not support SMETS 1 meters. This means that, if a SMETS 1 meter churns, it could lose smart functionality until these DCC Customers uplift to DUIS V3 or later versions.  
Whilst DCC notes that this issue may be one to be considered as a separate regulatory matter, this issue directly affects consumers. Recent government statements to the press indicate this problem would be solved when meters are connected to the DCC<sup>2</sup>. This is not strictly true until all DCC Customers are using DUIS V3 or later in the live production environment. This SEC Modification Proposal if successful would enable us to collectively agree a proposed route and timeframe to address this issue for consumers with SMETS 1 meters.
  - b. Secondly, an independent report published in 2019 projected that “a strategy to retire older versions of the DUIS could potentially represent a medium sized piece of work and could realise a reduction of the System Integration Testing timelines by an estimated 10%”<sup>3</sup>. DCC undertook to validate this

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<sup>1</sup> For DUIS, please read as DUIS with corresponding Message Mapping Catalogue (MMC) and Parse & Correlate software (P&C) as applicable.

<sup>2</sup> <https://www.telegraph.co.uk/bills-and-utilities/gas-electric/hallelujah-finally-able-demand-fix-dumb-smart-meter-christmas/>

<sup>3</sup> SEC Modification and BEIS Mandated Change Review, 24<sup>th</sup> May 2019 5.5.4 2<sup>nd</sup> para.

contention with DSP as part of the preliminary impact assessment process so that this proposal could be considered from a cost savings point of view.

- c. Thirdly, an enduring solution to manage 'retiring' older versions of DUIS going forwards is desirable as part of 'business as usual' processing. This would be a regular annual activity, ensuring appropriate notice and routine planning to manage this type of activity is in place with a 'new DUIS in – oldest DUIS out' process.

#### **4. To address these, DCC assessed:**

1. Uplift all DCC Customers on to DUIS V3.0 or later in order to ensure all Customers have capability to provide business services for both SMETS 1 and SMETS 2 meters (interoperability);
2. Remove DUIS V1.1 and DUIS V2 as this incurs time and costs with DCC regression testing with no associated increased functionality;
3. Introduce a 'business as usual' processing pattern, whereby historic versions of DUIS can be routinely subject to removal of DCC regression testing and maintenance support as we anticipate a new version of DUIS becomes available annually.

##### **4.1 Uplift for all DCC Customers to DUIS V3.0 or later versions (interoperability)**

From a DCC point of view, uplift to a new version of DUIS is a straightforward process to facilitate for our DCC Customers, and those who have adopted DUIS V3.0 thus far have provided positive feedback on the process.

From a Customer point of view, there is effort required in terms of back-end testing to ensure that end to end integrations remain in place for Customer business processing. DCC is informed that Customers would not wish to embark on this activity unless there is a business incentive to do so, or in order to meet a regulatory obligation (no regulatory obligation is in place to ensure all DCC Customers can operate both SMETS 1 and SMETS 2 meters).

DCC is informed that an implied responsibility exists, whereby at Device level, all reasonable steps must be taken to operate any meter enrolled in the DCC and Suppliers have an obligation to migrate SMETS 1 meters within 12 months of eligibility. DCC is advised for this reason, it would not be feasible to implement an effective deadline to uplift all Customers to DUIS V3.0 or later, before July 2021 at the earliest. The projected date for the next DUIS uplift following July would be November 2021.

##### **4.2 Remove DUIS V1.1 and DUIS V2 as these historic DUIS versions incur costs for DCC Customers with no associated increased functionality.**

DCC has liaised with DSP in order to obtain details of projected SIT savings identified in an independent report in 2019. We have informal DSP estimates of

reduction in time (and therefore costs) against regression testing undertaken in the November 2019 Release and projected against known scope for the November 2020 Release. DCC is informed that following changes made during 2019 to automate testing, regression testing time for DUIS V1 and DUIS V2 was approximately 4-5 days for the November 2019 SEC Release, and following further enhancements already made, approximately 1 day for the November 2020 Release.

It appears then, that removing DUIS V1.1 and DUIS V2 will provide a very small quantified time and cost benefit at this stage. This is insufficient benefit to justify (in itself) to justify implementing this change.

#### **4.3 Introduce a 'business as usual' processing pattern, for routine planned removal of historic DUIS versions as new DUIS versions become available.**

DCC and SECAS propose a straight-forward process by which any version of DUIS would have a validity period via the Technical Specification Applicability tables. A SEC Modification proposal can be swiftly progressed to ensure all SEC Parties and DCC Customers are aware, notified and can prepare for the end of a validity period. Following expiry of any DUIS validity period, any obligations on DCC and DCC Service Providers to undertake regression testing of such 'expired' DUIS versions at future releases of new DUIS capability would cease.

Preliminary assessment for technical changes recommended by CGI indicated a cost of £500,000 which has been rejected (Critical Software confirmed no costs). Instead, a solution involving no technical change has been reviewed by DCC Design Authority. Removal of associated DUIS Version web address (URL) is considered optimal, as this would remove Customer access to DUIS versions that are no longer supported. However, it is deemed acceptable to forgo URL removal initially, DCC may remove the URL later, once we confirm that all Customers have completed their uplift.

#### **Timing for implementation to remove DUIS V1.1 and DUIS V2.0**

5. As it is straightforward for a Customer to uplift from DUIS V1 direct to DUIS V3 or later, a phased transition for Customers on DUIS V1.1 to DUIS V2 and then DUIS V3.0 is not required.
6. The latest point at which eligible SMETS 1 meters must be 'migrated' or operated is July 2021. Thus, a recommendation on effective date for implementation for the removal of DUIS V1.1 and DUIS V2 from the SEC is as soon as feasible following July 2021. The projected date for the next new DUIS version following July 2021 is November 2021, and so this is the recommended implementation date for this SEC Modification proposal.

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7. This should provide all DCC Customers, including Smaller Suppliers, enough time to plan, execute and complete back-end testing to ensure that end to end integrations are in place for Customer business processing.

## **CONCLUSION**

8. The recommended solution addresses all elements identified within the problem statement. Following implementation in November 2021:
  - a. All DCC Customers will have a DUIS Version that enables them to send and receive messages to and from both SMETS 2 and SMETS 1 meters.
  - b. In terms of cost and time benefits projected in an independent report in 2019, these have already been achieved via some automation of PIT and SIT processes. Modest additional time and cost savings will be made with this change.
  - c. A business as usual process will be in place to manage retirement of historic older versions of DUIS going forwards from November 2021.

### 3 Context and Requirements

The context, issue statement, and requirements have been provided by SECAS and the Proposer.

#### 3.1 Multiple DUIS Versions

The DCC User Interface Specification (DUIS) is contained in SEC Appendix AD and sets out the technical details for how Users send and receive data from the DCC. All versions, both current and past, of DUIS are contained within the SEC. As a new version is created the old versions remain. This means that at any point in time different Parties can be using different versions of DUIS and therefore that the DCC must maintain each historical version as well as the latest version.

Currently, there are four active versions of DUIS and Schema alongside the supporting Message Mapping Catalogue (MMC) and Schema and Parse and Correlate (P&C) software versions. The introduction of DUIS v3.1 as part of the November 2019 Release will result in a fourth DUIS version. This will likely increase to a fifth version in the November 2020 Release, with the potential for a new version of DUIS to be created every year.

#### 3.2 The Issue

Two main issues were identified at the outset.

Firstly, a number of Users still use DUIS V1 or DUIS V2. Only DUIS V3.0 or later supports both Smart Metering Equipment Technical Specifications (SMETS)1 and SMETS2 meters. Therefore, Users who remain on DUIS versions V1 or V2 will not be able to communicate with SMETS 1 meters. This creates a risk that on a Change of Supplier event a SMETS1 meter could lose some Smart functionality. As a minimum therefore, a managed migration to DUIS V3.0 or later is recommended.

Secondly, Parties are incurring costs because the DCC is obligated to maintain all previous version of DUIS. All DCC Customers incur costs because DCC is obliged to maintain multiple versions of DUIS. These costs manifest themselves within day to day Operations Service Management, and within Testing for any Release as a result of regression test requirements for these older DUIS versions, in order to confirm these previous versions still operate satisfactorily. Given that there are no functionality changes to previous DUIS, Parties have been paying additional costs to support previous versions even though they remain unchanged. However, preliminary impact analysis indicates limited cost savings going forwards due to recent changes in regression testing processes.

A third issue was identified during Working Group discussion – the need to put an enduring business as usual process in place to address routine uplift and retirement of DUIS versions: hence the recommended name change for this SEC Modification proposal – to ‘Managing DUIS uplifts’.

SECMP0080 was raised by the DCC on 06/08/2019 to resolve this issue.

#### 3.3 Business Requirements for this Modification

This section contains the considerations and assumptions for each business requirement as provided by the Proposer and SECAS.

Req.	• Requirement
1	• DUIS will be placed into the TSAT document under the SEC
2	• End dates for DUIS versions within TSAT will be set as part of a relevant modification after consultation
3	• The end dates for DUIS V1 and V2 (i.e. when they will stop being supported) will be 26 November 2021
4	• The end dates for DUIS V3.0 and V3.1 will become TBC on implementation of SECMP0080
5	• Any further changes to DUIS V3.0 or V3.1 end dates will require a separate Modification

*Table 1: Business Requirements for SECMP0080*



## 4 Description of Solution

Documentation management and technical changes required by the solution are identified in the following sections.

### 4.1 Solution Overview

The SECMP0080 solution can be split into two components:

Enduring DUIS governance

Mandating the first managed uplift via this proposed enduring DUIS Governance, e.g. uplift of all DCC Customers to DUIS V3.0 or later.

#### 4.1.1 Enduring DUIS Governance

DUIS will be added to the Technical Specifications Applicability Tables (TSAT). Within TSAT each version of DUIS will have a relevant start and end date applied.

There will be no rule introduced that requires a set lead time for applying end dates to DUIS versions. The start and end dates in TSAT will be based upon industry consultation and the most appropriate dates applied on a case by case basis. It is however noted that Parties expect at least 2 versions of DUIS, for example V3.0 and V3.1, to be supported at any one time.

DUIS can only be amended by a SEC Modification or a BEIS designation (during the transition from BEIS to SECAS oversight). Therefore, if a Modification results in a new version of DUIS, the legal text changes for that Modification will include the required changes to the DUIS versions in TSAT. For example, if MPxxx impacts DUIS and requires a new DUIS version, then the legal text for MPxxx will include redline changes to the start and end dates of the new DUIS version and any previous DUIS versions. Equally any BEIS designation that impacts DUIS will include the required redline changes to the TSAT.

Placing DUIS in TSAT will ensure only relevant version of DUIS remain supported and it is clear to all Parties when there would be a required transition to the latest DUIS version.

#### 4.1.2 Mandating the first managed Uplift to DUIS V3.0 or later

DUIS will be added to the Technical Specification Applicability Tables (TSAT) which will provide relevant information regarding start and end dates. For this Modification, it is proposed to apply the following dates in TSAT for DUIS V1.1 and DUIS V2.0:

DUIS Version	Start Date	End Date
v1.1	01/11/2018	26/11/2021
v2.0	05/06/2018	26/11/2021
v3.0	28/07/2019	<i>To be confirmed (TBC)</i>
v3.1	28/11/2019	<i>To be confirmed (TBC)</i>



These changes would mandate that all Parties are using either DUIS V3.0 or DUIS V3.1 by November 2021 and that both versions 3.0 and 3.1 are supported by the DCC until the dates in the table are amended in the future.

As new versions of DUIS are created in 2020 and 2021, appropriate end dates could be applied for DUIS V3.0 and V3.1 via a SEC Modification Proposal.

In terms of the SEC and subsidiary documents, the following parts of the SEC will be impacted:

- Schedule 11 'TS Applicability Tables' (addition of DUIS into the table),
- When the end date occurs, Appendix AD 'DCC User Interface Specification' (removal of DUIS V1.1 and DUIS V2.0 from the SEC and from the SECAS website.)

## **4.2 DCC Solution Overview, impact on process and people**

No DCC system change will be made on the effective date of removal of DUIS V1.1 and DUIS V2.0 from the SEC. DCC Service Desk will be prepared in order to support any queries from DCC Customers in this regard. DCC will monitor use and may remove an associated DUIS Version web address (URL) once all DCC Customers have ceased using these versions of DUIS. As part of DCC In Life change process, where any forthcoming SEC Release has an associated uplifted version of DUIS in scope, the DCC Release Manager will raise a SEC Modification Proposal for the removal of older historic DUIS version going forwards as part of a business as usual process. As part of this process, DCC Compliance will initiate any required contractual schedule changes (e.g. minor contractual amendment to remove support for a particular DUIS version from the DSP contract).

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## 5 Implementation Timescales and Approach

.For this first implementation, the recommended implementation is November 2021 for the removal of DUIS V1.1 and DUIS V2.0 from the SEC. It is likely there will be a 'grace period' of 4 weeks whilst DCC will monitor use, and once all DCC Customers have ceased use, a small change will be made to remove the DUIS web address associated with DUIS V1.1 and DUIS V2.0.

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## **6 Costs and Charges**

As there is no cost associated with this SEC Modification; removal of URLs is projected as very low cost (less than £50K), earliest projected date for these costs to be incurred is January 2022.

## 7 Risks, Assumptions, Issues, and Dependencies

In the following sections, Risks, Assumptions, Issues, and Dependencies have been identified.

### 7.1 Risks

Ref.	Area	Description	Accept
MP80-R01		<p><b>There is a risk that</b> DCC Customers still using DUIS V1.1 and DUIS V2.0 will not plan to implement the uplift in time.</p> <p>In mitigation, SECAS and DCC will work to ensure that all SEC Parties are suitably informed. To note, there is a generous notice period in the lead up time to November 2021, and DCC will ensure communication both with DCC Customers and their Adaptor Providers.</p>	
MP80-R02		<p><b>There is a risk that</b>, before November 2021, Consumers face the risk of loss of Smart functionality if they switch to a Supplier who is not already using DUIS V3.0.</p> <p>This is beyond the scope of this SEC Modification proposal. DCC would welcome additional action to support/address consumer needs in this regard.</p>	

### 7.2 Assumptions

Ref.	Area	Description	Accept
MP80-A01		Following changes made to automate regression testing in PIT and SIT, savings gained as a result of removing historic versions of DUIS are modest, circa 1 day in SIT per DUIS version (at most).	
MP 80- A02		Any Customer can 'uplift' to the latest version of DUIS, they do not need to plan to uplift to the next DUIS version. E.g. a Customer on DUIS V1.1 can uplift straight to DUIS V3.1 if they wish.	
MP 80-A03		The proposed Business as Usual process, whereby a SEC Modification Proposal should be raised to retire historic/older versions of DUIS going forwards, can be efficiently and economically processed.	

### 7.3 Issues

None at this time.

### 7.4 Dependencies

Ref.	Area	Dependency	Impact
MP80-DD01		DCC will not remove Web Location Address (URL) for DUIS V1.1 and DUIS V2.0 until all DCC Customers have uplifted to DUIS V3.0 or later.	Med



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# MP080 ‘Managing DUIS uplifts’

## Annex D

## Refinement Consultation responses

### About this document

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This document contains the full collated responses received to the MP080 Refinement Consultation.

## Question 1: Do you agree with the solution put forward?

Question 1			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	Yes	
Western Power Distribution	Electricity Network Party	No	<p>We agree with the intent of the modification and we also agree with the proposed end date of DCC DUIS V1.1 and V2.0.</p> <p>We are unsure exactly why the TSAT is being removed from the SEC. All new DUIS releases will require a SEC modification to update the SEC Appendix AD and therefore we would expect these modifications to address adding the new version of DUIS to the TSAT as well as end dating any previous versions as appropriate. If it is to be removed we believe that there needs to be very clear governance around who and how this document gets updated.</p>
EDF Energy	Large Supplier	No	<p>We agree with the proposal for DUIS will be added to the TSAT and for each version of DUIS to have a relevant start and end date applied. We also agree that the start and end dates in TSAT will be based upon industry consultation and the most appropriate dates applied on a case by case basis. We also agree that at least two versions of DUIS should be supported at any one time.</p> <p>We strongly disagree with the element of the solution that proposes to remove the TSAT from the SEC and for changes to it to be managed through the TABASC. Changes to the validity period for the DUIS and Devices in TSAT have significant material impacts on SEC Parties, especially where it is proposed that end dates will be introduced which will require Parties to upgrade their devices or their User Systems. Changes of this magnitude and materiality should only be made through the SEC Change process and decided on by SEC</p>

Question 1			
Respondent	Category	Response	Rationale
			<p>Parties through the Change Board (and potentially the Authority), not by TABASC based on industry consultation.</p> <p>We have concerns about how this proposal to remove the TSAT from the SEC has been included in this change as it is outside the original scope of this change raised. It is also not called out clearly in the description of the solution, either in the Modification Report or in the brief description in this form. It is only really evident in the legal text; given the significance of this change we find the failure to call this impact out to SEC Parties very worrying.</p>
Electricity North West Limited	Electricity Network Party	Yes with caveats	<p>The proposed solution will better facilitate SEC objectives a) and g)</p> <p>SEC Objective (a) is better facilitated by improving the provision and operation of smart metering Devices at consumer premises. This is by ensuring that SEC Parties uplift their versions of DUIS to a version that can communicate with both SMETS1 and SMETS2 meters, this will reduce the likelihood of operational issues.</p> <p>SEC Objective (g) is better facilitated by making the implantation of the SEC a more efficient process. With less versions of DUIS to support and test against, this will reduce resources managing older documents and in testing scenarios for Releases.</p> <p><b>Caveat:</b></p> <p>As future versions of DUIS could contain unforeseen technical challenges then it is extremely difficult for parties to ascertain any potential impact prior to the respective consultation processes. As the consultation process is based upon a majority verdict then this could mean changes being forced upon parties which conflict with their own operational, technical or commercial constraints.</p> <p>Therefore, there needs to be a derogation process which would allow users to apply to continue using older versions of DUIS for a short duration (albeit maybe not technically fully</p>



Question 1			
Respondent	Category	Response	Rationale
			<p>supported by DCC) in the event of a significant issue which prevents them moving to the newer version by the required date. Otherwise parties would be effectively barred from using the smart meter service.</p> <p>Our understanding is that the removal of DUIS versions requires no technical or system change and therefore in agreed circumstances it should be possible that older versions could endure longer albeit not expressly supported by DCC.</p>
<b>SSEN</b>	Electricity Network Party	Yes	SSEN agree with the proposed solutions of mandating the uplift to latest DUIS versions (v3.0 and v3.1) for the purposes of SMETS1 functionality. We also agree with moving DUIS to the TSAT.
<b>OVO</b>	Large Supplier	Yes	<p>Yes, however our agreement is subjected to the fact that any end dates for documents within the TSAT will be consulted upon (as stated in A3.34 (b)) and that 'at least 2 versions of DUIS will be supported at any one time'. It is also important that the DUIS start date must not be seen as a firm go live date for Suppliers.</p> <p>We agree with the first part of 'Moving DUIS to the TSAT' - we agree that it'd be easier to find all documents in one place and that it will reduce DCC cost of maintaining multiple versions and in turn reduce the cost for SSE as a SEC Party.</p> <p>We are not sure about the 2<sup>nd</sup> part 'Mandating uplift to latest DUIS versions (v3.0 and v3.1)' – While we are fine with the two latest DUIS Versions to support SMETS1, we have concerns regarding future DUIS version as changes and industry document are often not available in a timely manner before the DUIS Document is designated. As shown in the table these DUIS version only has 4 months apart.</p> <p>v3.0 28/07/2019 TBC</p> <p>v3.1 28/11/2019 TBC</p>

Question 1			
Respondent	Category	Response	Rationale
			We suggest that apart from Start date and End date the table should also include a date that states when SEC Parties must be on certain version by. Naturally that would tie in with the 'End dates' of the previous versions however this is not clear in the table presented in Page 5.

## Question 2: Will there be any impact on your organisation to implement MP080 that you have not already planned for?

Question 2			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	No	
Western Power Distribution	Electricity Network Party	No	We are currently on DUIS V3.0.
EDF Energy	Large Supplier	No	This change should have no impact on our organisation.
Electricity North West Limited	Electricity Network Party	No	It is already our intention to migrate to DUIS v3 within calendar year 2020 so no additional costs will be incurred.
SSEN	Electricity Network Party	No	SSEN are currently in the process of uplifting to DUIS v3.0.
OVO	Large Supplier	No	No. However sufficient time should be given to Supplier to implement the latest DUIS version before the end dates of the last available versions. We would like at least 1 year from the date a new version of DUIS document is published.

### Question 3: If your answer to Question 2 is 'yes', will your organisation incur any costs in implementing MP080?

Question 3			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party		
Western Power Distribution	Electricity Network Party	N/A	
EDF Energy	Large Supplier	No	We will not incur any costs as a direct result of MP080.
Electricity North West Limited	Electricity Network Party	No	It is already our intention to migrate to DUIS v3 within calendar year 2020 so no additional costs will be incurred.
SSEN	Electricity Network Party	N/A	
OVO	Large Supplier	No	No, not at the time of the TSAT table designation. However it is understood that cost will be incurred when a new DUIS version is incorporated in our systems

## Question 4: Do you believe that MP080 would better facilitate the General SEC Objectives?

Question 4			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	Yes	
Western Power Distribution	Electricity Network Party	Yes	We agree that the intent of Modification 080 would better facilitate SEC Objectives (a) and (g) for the reasons stated in the modification, although we don't agree with the proposed solution.
EDF Energy	Large Supplier	Yes	We agree that this change would better facilitate SEC objective (a) by ensuring that DCC Users are using a version of DUIS that supports the full capability of smart meters in the market and therefore enables all consumers to access those services and ensure interoperability.  We agree that this change would better facilitate SEC objective (g) by making it clearer which versions of DUIS are available to Users and for validity periods of DUIS versions to be managed in a transparent way.
Electricity North West Limited	Electricity Network Party	Yes	Please see our response to Q1 above.
SSEN	Electricity Network Party	Yes	SSEN agree that the implementation of MP080 would better facilitate SEC Objectives (a) and (g) as detailed in the modification.
OVO	Large Supplier	Yes	This would bring DUIS in line from a document control perspective with other parts of SEC.

## Question 5: Noting the costs and benefits of this modification, do you believe MP080 should be approved?

Question 5			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	Yes	
Western Power Distribution	Electricity Network Party	No	Please see comments under Question 1 regarding the location of the TSAT.
EDF Energy	Large Supplier	No	We would not support the current solution as it proposes to remove the TSAT from the SEC and therefore the scope of the SEC change processes. We do agree with the proposal to include the DUIS in the TSAT and would support this change if the scope were limited to that change.
Electricity North West Limited	Electricity Network Party	Yes	As per earlier responses
SSEN	Electricity Network Party	Yes	Whilst SSEN believe that this Mod should be approved and we agree with the SEC costing detailed. We would like to see a more detailed breakdown of the DCC costs, that result in an amount of "less than 50K".
OVO	Large Supplier	Yes	Yes with conditions. Again, our agreement is subjected to the fact that any end dates for documents within the TSAT will be consulted upon and that 'at least 2 versions of DUIS will be supported at any one time' and that the 'Start date' is not seen as a firm date for Supplier go live.

## Question 6: How long from the point of approval would your organisation need to implement MP080?

Question 6			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party		
Western Power Distribution	Electricity Network Party	Minimal	We are happy for this to be approved in line with the planned implementation date.
EDF Energy	Large Supplier	N/A	We would not require any lead time to implement this change.
Electricity North West Limited	Electricity Network Party	We are comfortable with having to implement DUIS v3 by the deadline date of November 2021	
SSEN	Electricity Network Party	N/A	As we are already in the process of uplifting to DUIS V3, no further implementation activities would be required from the implementation of this Mod.
OVO	Large Supplier	N/A	N/A. Again, this change is only documentation change until a DUIS version is end-dated and that we must move on to a new DUIS version.

## Question 7: Do you agree with the proposed implementation approach?

Question 7			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	Yes	
Western Power Distribution	Electricity Network Party	Yes	We agree with the proposed implementation date and believe that the proposed end dates of DUIS V1.1 and DUIS V2.0 allow enough time for Users to upgrade to either DUIS V3.0 or DUIS V3.1.
EDF Energy	Large Supplier	Yes	
Electricity North West Limited	Electricity Network Party	Yes	The approach does seem reasonable and will ensure that there are two versions of DUIS being supported at any one time. However, within the Business Requirements Document Ref 2 states ' <i>The end dates for DUIS v1.0 and v2.0 (i.e. when they will stop being supported) will be <b>26 November 2020</b></i> '. Shouldn't this be ' <b>26 November 2021</b> '?
SSEN	Electricity Network Party	Yes	SSEN agree with the proposed implementation dates for end dating DUIS V1.1 & DUIS V2 and the implementation of DUIS versions and details into the TSAT.
OVO	Large Supplier	Yes	No comment



## Question 8: Do you agree that the legal text will deliver MP080?

Question 8			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	Yes	
Western Power Distribution	Electricity Network Party	No	<p>We have the following views on the legal with regards to the proposed solution:</p> <ol style="list-style-type: none"> <li>1) On page three of the Legal Text under section A3.34(b) it states that the amendments are required to be consulted upon and approved by TABASC, however on page 10 of the Modification Report it states that the enduring proposed solution will allow for the SEC Panel (or a delegated Sub-Committee). Therefore we believe that the legal text should state the SEC Panel. This will also align with similar processes elsewhere.</li> <li>2) The current versions of DUIS according to the SEC are, V1.1, V2.0, V3.0 and V3.1, however the legal text refers to DUIS V1.0. This needs changing to V1.1.</li> </ol> <p>However, as raised in previous questions we actually disagree with the proposed solution and therefore disagree with the legal text in its entirety.</p>
EDF Energy	Large Supplier	No	As noted previously we disagree with the element of the legal text that proposes to remove the TSAT from the SEC, this element of the legal drafting changes should be removed.
Electricity North West Limited	Electricity Network Party	Yes	We believe the legal text will deliver the intent of this proposal.
SSEN	Electricity Network Party	No	There seems to be a discrepancy in statements with how the TSAT is managed and maintained.

Question 8			
Respondent	Category	Response	Rationale
			On page 5 of the modification report is it stated that “There will be no rule introduced that requires a set lead time for applying end dates to DUIS versions. The start and end dates in TSAT will be based upon industry consultation and the most appropriate dates applied on a case by case basis.”. However on page 3 of the legal text it states “subject to any such amendments being consulted upon and approved by the Technical Architecture and Business Architecture Sub-Committee”.
<b>OVO</b>	Large Supplier	Yes	We would recommend that regular communication is sent out, as a warning that earlier versions of DUIS will not be supported.

## Question 9: Are you a User of DUIS v1.0 or DUIS v2.0 and if so, is the proposed window for uplifting to DUIS v3.0 effective November 2021 appropriate?

Question 9			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	n/a	
Western Power Distribution	Electricity Network Party	N/A	
EDF Energy	Large Supplier	N/A	
Electricity North West Limited	Electricity Network Party	Yes	We are currently a DUIS v1 User intending to migrate to DUIS v3 within calendar year 2020. We agree that the effective date of November 2021 for implementing DUIS v3 is appropriate.
SSEN	Electricity Network Party	Yes	Yes – SSEN agree that the November 2021 is an appropriate date to uplift to DUIS V3
OVO	Large Supplier	No	We are using DUIS 3.

## Question 10: If this Modification Proposal is accepted, do you agree with the intent of one DUIS uplift per year as part of the business as usual process?

Question 10			
Respondent	Category	Response	Rationale
Calvin Capital	Other SEC Party	n/a	
Western Power Distribution	Electricity Network Party	Yes	We believe that it will be easier to manage one DUIS uplift a year as a business as usual process.
EDF Energy	Large Supplier	Yes	We agree that, as far as practicable, no more than one DUIS uplift per year should be implemented. We would note that the costs of implementing an uplift to a new version of DUIS are very significant, each new version of the DUIS must deliver benefits that are significant enough to justify making such a change – there is no point in making piecemeal changes to the DUIS just because we have an annual release planned.
Electricity North West Limited	Electricity Network Party	Yes	Having one DUIS uplift per year will allow parties to effectively plan for and schedule uplift activities
SSEN	Electricity Network Party	Yes	SSEN support one uplift per year. Once uplifted to DUIS V3.0 which will support SMETS1, we believe that ensuring only one uplift a year is key alongside providing backwards compatibility. This will provide an adequate timeframe for users to manage uplifts to newer DUIS versions in the future.
OVO	Large Supplier	Yes	No comment

## Question 11: Please provide any further comments you may have

Question 11		
Respondent	Category	Comments
Calvin Capital	Other SEC Party	
Western Power Distribution	Electricity Network Party	
EDF Energy	Large Supplier	As noted above we are very concerned that the solution proposed, specifically the proposal to remove the TSAT from the SEC, is outside of the scope of this original change and has not been called out sufficiently in the Modification Report. We don't think that this change should have been included in the scope of MP080, and that it should have been much more prominent in the Report.
Electricity North West Limited	Electricity Network Party	No further comments to add.
SSEN	Electricity Network Party	N/A
OVO	Large Supplier	No comment