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Paper Reference:	SECP_93_1806_19
Action:	For Decision

SEC Modification Progression

1. Purpose

This paper sets out the Draft Proposals and Modification Proposals that are ready to proceed to the next stage of the framework and our recommendations to the Panel on how each should be taken forward.

2. Recommendations

This table lists our recommendations for each Draft Proposal and Modification Proposal.

Full details of each proposal can be found in the attached draft Modification Reports.

Proposal	Recommendations
MP138 'DCC Service Testing in ETAD'	<ul style="list-style-type: none"> • AGREE that MP138 should be progressed to the Report Phase; • APPROVE the Modification Report; • APPROVE the implementation approach; and • AGREE that MP138 should be progressed as a Self-Governance Modification.
DP159 'Credit Cover Review'	<ul style="list-style-type: none"> • AGREE that DP159 should be converted to a Modification Proposal; • AGREE that MP159 should be progressed to the Refinement Process; and • AGREE the first package of work and the timetable for this modification.
DP160 'Certificate Signing Request forecasting'	<ul style="list-style-type: none"> • AGREE that DP160 should be converted to a Modification Proposal; • AGREE that MP160 should be progressed to the Refinement Process; and • AGREE the first package of work and the timetable for this modification.

Proposal	Recommendations
DP162 'SEC changes required to deliver MHHS'	<ul style="list-style-type: none"> • AGREE that DP162 should be converted to a Modification Proposal; • AGREE that MP162 should be progressed to the Refinement Process; and • AGREE the first package of work and the timetable for this modification.

Ali Beard

SECAS Team,

11 June 2021

Attachments:

- **Appendix A:** MP138 draft Modification Report
- **Appendix B:** MP159 draft Modification Report
- **Appendix C:** MP160 draft Modification Report
- **Appendix D:** MP162 draft Modification Report

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MP138 'DCC Service Testing in ETAD'

Modification Report

Version 0.5

11 June 2021

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About this document

This document is a Modification Report. It sets out the background, issue, solution, impacts, costs, implementation approach and progression timetable for this modification, along with any relevant discussions, views and conclusions.

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This document also has three annexes:

- **Annex A** contains the redlined changes to the Smart Energy Code (SEC) required to deliver the Proposed Solution.
- **Annex B** contains the Data Communications Company (DCC) Great Britain Companion specification (GBCS) for Industry (GFI) Provision and Allocation Policy.
- **Annex C** contains the Refinement Consultation responses.

Contact

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1. Summary

This proposal has been raised by Richard Collard on behalf of the DCC.

The scope of SEC Appendix J 'Enduring Testing Approach Document' (ETAD) was initially to ensure DCC Users had appropriate provisions to undergo the User Entry Process Testing (UEPT). However, the ETAD does not include all the Testing Services that the DCC offers.

The DCC has been working with Device Manufacturers to understand their testing needs and develop additional Testing Services.

The Proposed Solution is to add four Testing Services to the ETAD. This modification has an impact on the DCC in regard to finance and charging. There are no costs to SEC Parties as a result of this change.

Some minor housekeeping changes have also been included in this modification. These are typographical errors and changing erroneous references to 'the Technical Architecture and Business Architecture Sub-Committee' (TABASC) to 'the Panel'. SEC Section C6.4 allows the Panel to delegate to any Sub-Committee any of its duties, powers and functions as the Panel may specify. These changes bring these references into line with the rest of the SEC.

This is a Self-Governance Modification and is targeted for implementation in the November 2021 SEC Release.

2. Issue

What are the current arrangements?

Testing Services

A recent review of interoperability change commissioned by the Department of Business, Energy and Industrial Strategy (BEIS) included a recommendation to update the SEC testing approach documentation to include Device Manufacturer related Testing Services and validate with industry to ensure that these services are fit for purpose.

The initial ETAD was designed to deliver support to DCC Users to qualify through entry process testing and to operate freely within the User Integration Testing (UIT) environment. However, there has been increasing recognition amongst industry of the value of providing Testing Services to Device Manufacturers who are not DCC Users. The DCC has therefore been in discussion with industry, particularly Device Manufacturers, to help shape the Testing Services that the DCC offers.

Charging

SEC Section K 'Charging Methodology' enables Testing Participants (which can include Device Manufacturers) the option to currently pay for "additional testing support" (SEC Section K7.5(i)). The "additional testing support" charge is an Explicit Charge and is based on the cost of one consultant

per day. Testing Participants may request additional testing support in accordance with SEC Section H14.33 to understand and resolve issues associated with:

- the DCC Total System and the results of such Testing Participant's Device and User System Tests.
- the Systems of the Testing Participant that are (or are intended to be) User Systems.
- communications between the DCC and any Device or between Devices which comprise (or which the Testing Participant intends will comprise) a Smart Metering System.

What is the issue?

The ETAD does not currently include three existing Testing Services and one new Testing Service that the DCC offers. The Explicit Charging statement does not cover charging for these new Testing Services.

In addition, the DCC proposes that the ETAD is reviewed for misalignments and amended accordingly. For instance, obligations in relation to GFI are currently in SEC Section X9 'Interim Device and User System Testing'. It is proposed that this be removed and included within the ETAD as Section X is expected to be removed from the SEC in due course and the ETAD is an enduring document.

The Testing Services within scope of this modification are summarised in the below table:

Existing Testing Services not currently in the ETAD		
Testing Service	Customers	Description
Interoperability and Innovation Events	Device Manufacturers	Occasionally (and at its discretion), the DCC hosts Interoperability and Innovation Events. These developmental events provide Device Manufacturers with a platform to test connectivity, interoperability, interchangeability and functionality between Home Area Network (HAN) Devices. These events often provide Device Manufacturers with access to real life Communications Hubs.
Great Britain Companion Specification (GBCS) for Industry (GFI)	Device Manufacturers, Suppliers	<p>This is a free tool developed by the DCC. It comprises of software and a ZigBee HAN interface to simulate the DCC and Communications Hubs for testing HAN Commands and Responses with:</p> <ul style="list-style-type: none"> • Electricity Smart Metering Equipment (ESME) • Gas Smart Metering Equipment (GSME) • In-home Displays (IHDs) • Prepayment Meter Interface Devices (PPMIDs) • Consumer Access Devices (CADs) • HAN Connected Auxiliary Load Control Switches (HCALCSs) <p>The tool allows Users to emulate sending and receiving GBCS messages to help identify any potential differences between how Parties have interpreted the Technical Specifications in comparison with the DCC interpretation. The tool has the capability to emulate a</p>

Existing Testing Services not currently in the ETAD		
Testing Service	Customers	Description
		Communications Hub to enable testing with real Smart Metering Devices.
Wired Instrumented Test Communications Hub (ITCH)	Device Manufacturers	<p>Wired ITCH is a Communications Hub used in test environments that allows Device Manufacturers to send Wide Area Network (WAN) Commands from a GFI through a wired interface. This is required as Device Manufacturers do not have the ability to send Commands to the DCC for delivery over the WAN. A Wired ITCH can be used with emulators and real-life ESME/GSME.</p> <p>Device Manufactures are able to order Wired ITCH in accordance with SEC Section F10.</p>

New Testing Services not currently in the ETAD		
Testing Service	Customers	Description
Radio Frequency (RF) Noise	Device Manufacturers	<p>The DCC previously worked with the industry to develop the RF Noise requirements in the Intimate Communications Hub Interface Specification (ICHIS) and the associated test specification. Following industry consultations in 2018, the DCC funded a temporary central test lab facility, provided by Plextek, to support testing to the ICHIS test specification. The DCC provided funding to support the eight-meter testing to ICHIS 2.0 in Quarter 3 2019.</p> <p>The DCC reviewed the need for an enduring central lab facility with the ICHIS Working Group and Energy Suppliers through Q3 and Q4 2019. The DCC has concluded an enduring central test facility is required to enable Device Manufacturers to test their Devices and ensure they meet the ICHIS, so they do not impact the WAN or HAN performance.</p> <p>A general RF testing capability was procured as part of the DCC's Brabazon House testing facilities in 2019 as it was required for network technology tests. The DCC is migrating the test facility from the temporary appointed sub-contractor (Plextek) to DCC Brabazon House; this is expected to conclude in Q3 2020.</p>

What is the impact this is having?

The Proposer believes the impact of not amending the ETAD to include the existing and new Testing Services would misalign with current DCC processes. By adding these Testing Services to the ETAD, appropriate charging arrangements would be reflected in the SEC for the RF Noise Testing Service, whilst also giving greater clarity to the other Testing Services the DCC offers.

Impact on consumers

There is no impact on consumers.

3. Solution

Proposed Solution

The Proposed Solution seeks to add the new and existing Testing Services set out above to the ETAD to provide greater clarity to SEC Parties and wider industry on the Services available to them.

The DCC considers that the current arrangements around the Explicit Charge for Testing Services are not currently fit for the purpose of charging for these Testing Services. Therefore, the solution will provide greater oversight on what Testing Services are available and the charging arrangements around them.

Interoperability and Innovation Events

These events are held on occasion. The DCC does not currently charge for these and are not proposing any Explicit Charges for these.

GFI

There will be a new Explicit Charge for GFI; this will be in accordance with a new GFI provisions and allocation policy produced by the DCC. This means that Parties will only be charged for GFI tools if they have exceeded their allocation. The GFI Provisions and Allocation Policy can be found in Annex B.

Wired ITCH

Device Manufactures are able to order Wired ITCH in accordance with SEC Section F10. The DCC currently have an Explicit Charge for Wired ITCH set out in SEC Section K. The DCC proposes to move the references into the ETAD for clarity and consistency.

RF Noise Testing

Following industry consultations in 2018, the DCC funded a temporary central test lab facility, provided by Plextek, to support testing to the ICHIS test specification. The initial set up costs have been through price control and socialised across Users via DCC Fixed Charges.

The DCC currently fund the monthly maintenance costs to ensure the continuity of a Central Lab Facility with up-to-date Test Procedures, as specified from ICHIS Working Group. Parties pay Plextek directly for test days used.

The Charging Statement will not feature the '*RF Noise Testing*' charge unless it is designated in the SEC. If this continues to be the case, the DCC would continue to fund the maintenance charges with Plextek and be unable to recover any charges from Device Manufacturers. The Proposed Solution is

to ensure that, via a new Explicit Charge, meter manufacturers will be charged a day-rate that reflects the costs incurred by the DCC for resource and materials of using the facility at Brabazon House. DCC Users can book the service for no additional charge.

The DCC would cease to pay the monthly maintenance charges to Plextek once the service has been fully set up in Brabazon House. The avoidance of monthly maintenance fees to Plextek and a setup fee included within the day rate will mitigate further setup costs (£65,000) within the first eight months.

The setup costs that have previously been socialised across DCC Users (and have been through price control) would be balanced over a two-year period from the avoidance of monthly maintenance fees combined with the setup fee included within the day rate. The charge for the setup fee could be given back to DCC Users through a rebate mechanism.

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

Breakdown of Other SEC Party types impacted			
	Shared Resource Providers		Meter Installers
✓	Device Manufacturers		Flexibility Providers

This modification impacts SEC Parties positively due to the greater clarity provided within the ETAD of Testing Services available to them. In addition, there is an impact on Parties around GFI testing and RF Noise testing in respect to the charging arrangements. Suppliers are impacted by this modification, as they have a responsibility to ensure their meters are RF Noise compliant.

DCC System

There are no impacts on DCC Systems in this modification.

SEC and subsidiary documents

The following parts of the SEC will be impacted:

- Section H 'DCC Services'
- Section K 'Charging Methodology'

- Schedule 7 'Specimen Enabling Services Agreement'
- Appendix J 'Enduring Testing Approach Document'

The changes to the SEC required to deliver the proposed solution can be found in Annex A.

Consumers

There is no impact on consumers from this modification.

Other industry Codes

There is no impact on other industry Codes from this modification.

Greenhouse gas emissions

There is no impact on greenhouse gas emissions from this modification.

5. Costs

DCC costs

There are no DCC costs to implement this change.

SEC Party costs

There were two respondents to the Refinement Consultation both of whom stated that they would not incur any costs in the implementation of this modification.

SECAS costs

The estimated 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.

6. Implementation approach

Recommended implementation approach

SECAS is recommending an implementation date of:

- **4 November 2021** (November 2021 SEC Release) if a decision to approve is received before 21 October 2021; or
- **24 February 2022** (February 2022 SEC Release) if a decision to approve is received after 21 October 2021 but on or before 10 February 2022.

This is a document only change and it has no impact on DCC Systems; it simply seeks to clarify the Testing Services DCC offer in the ETAD. The modification also seeks to clarify charging arrangements of some Testing Services. The November 2021 SEC Release is the earliest SEC Release this modification could be included in.

7. Assessment of the proposal

Observations on the issue

The DCC informed the Change Sub-Committee (CSC) that a charging element may need to be introduced for RF noise testing within the SEC, or alternatively, the existing method of charging would need to be reviewed. A CSC member questioned whether the Testing Advisory Group (TAG) has provided views on this proposal and whether this will be presented to it in the future. SECAS noted that the TAG had not provided any input at that point, however, it was subsequently discussed as part of the Refinement Process.

Solution development

Working Group members also raised a concern that there was duplication between this modification and [MP111 'Smart Metering Device Assurance \(SMDA\) Budget Amendments'](#). The DCC clarified that this modification is not a duplication of MP111. Testing Services will be carried out in DCC Test Laboratories by Device Manufacturers and is specific to the issue of RF Noise. It was further explained that the SMDA Scheme is independent and looks more at the interoperability of Devices rather than individual functionality tests such as RF Noise. SECAS and the DCC agreed that the clarification should be noted within the modification to clarify there is no duplication with MP111.

During solution development the DCC encountered issues on the RF Noise element of the modification due to COVID-19. The DCC advised that an internal issue within its Test Laboratories needed to be resolved, as the issue within its labs interfered with frequencies. The DCC explained that workers were unable to access their labs due to COVID-19 restrictions, therefore, solution development was delayed until February 2021.

The TAG was initially concerned around the set-up costs for the RF Noise Frequency testing but the DCC highlighted that the setup costs that have previously been through price control and socialised across DCC Users. For this reason, the DCC proposed that DCC Users would pay no additional charge for this service.

The Working Group supported the change, however, felt clarity is required to show the modification is focused on individual functionality and not focused on interoperability. One member queried if the modification would make the Testing Services discussed mandatory or voluntary. The DCC advised the Testing Services would be voluntary. It added that this modification would introduce a new Explicit Charge for RF Noise testing. Currently RF Noise, GFI and interoperability testing is not charged by the DCC. (The DCC currently have an Explicit Charge for Wired ITCH set out in SEC Section K.)

There were two respondents to the Refinement Consultation, both were Large Suppliers. One was supportive of the modification. The other, whilst supportive, raised some concerns around the set-up costs. They requested that the DCC confirm that there would be no additional cost implications in relation to these additional services for SEC Parties now or in the future. The DCC has confirmed this is the case and no additional costs would be charged to SEC Parties for these services through Fixed Charges. The ongoing maintenance will be reviewed annually and will be included in the Explicit Charges, which will be managed through the Charging Statement review process. The DCC believed that this did not need to be included in the legal text but should be made clear in this Modification Report.

In addition, the Supplier questioned if these changes were needed since all these tests were already offered by the DCC and the charges were not changing (except in the case of RF noise testing and GFI allocations). The DCC believed this change provides further clarity around the arrangements for Testing Services.

The DCC specifically requested respondents' feedback on whether the costs recovered should be rebated to those who bore the initial set up costs. One respondent believed they should, and the other did not.

Support for Change

The CSC supported this change and recommended that the modification be discussed at TAG for further clarity.

The Working Group supported the change once the points raised had been clarified and the two respondents to the Refinement Consultation were supportive, although one had additional comments as set out above.

Views against the General SEC Objectives

Proposer's views

The Proposer believes this modification will better facilitate:

- SEC Objective (a)¹ as it provides industry on greater oversight of Testing Services available to them; and
- SEC Objective (b)² as it will enable the DCC to comply with its obligations, by providing further clarity around the arrangements of Testing Services.

¹ Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain

² Enable the Data Communications Company to comply at all times with the General Objectives of the Data Communications Company (as defined in the Data Communications Company Licence), and to efficiently discharge the other obligations imposed upon it by the Data Communications Company Licence

Industry views

One Refinement Consultation respondent believed that since these tests are already available from the DCC this change offers only a minimal improved facilitation of the Objectives set out in this report. Initially the Proposer had suggested that this modification would also better facilitate SEC Objective (e)³ but following the Refinement Consultation agreed that this should be removed.

Views against the consumer areas

Improved safety and reliability

The increased provision of testing will help increase the safety and reliability of Devices and Smart Metering Systems for consumers.

Lower bills than would otherwise be the case

This modification will be neutral against this area.

Reduced environmental damage

This modification will be neutral against this area.

Improved quality of service

This modification will improve quality of service, as Testing Services enable the improvement of quality of devices, by ensuring industry to remains compliant with the quality of Devices.

Benefits for society as a whole

This modification will be neutral against this area.

Appendix 1: Progression timetable

This Modification Report will be presented to Panel for approval, then be issued for Modification Report Consultation followed by Change Board vote.

Timetable	
Event/Action	Date
Presented to CSC for initial comment	28 Jul 2020
Presented to CSC for final comment and recommendations	25 Aug 2020
Panel converts Draft Proposal to Modification Proposal	11 Sep 2020

³ Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy.

Timetable	
Event/Action	Date
Modification discussed with Working Group	7 Oct 2020
Modification discussed with TAG	24 Feb 2021
Modification discussed with TAG	28 Apr 2021
Modification discussed with Working Group	5 May 2021
Refinement Consultation	17 May – 7 Jun 2021
Modification Report presented to Panel	18 Jun 2021
Modification Report Consultation	21 Jun – 9 Jul 2021
Change Board Vote	28 Jul 2021

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	Department of Business, Energy and Industrial Strategy
CAD	Consumer Access Device
CSC	Change Sub-Committee
DCC	Data Communications Company
ESME	Electricity Smart Metering Equipment
ETAD	Enduring Testing Approach Document
GBCS	Great Britain Companion Specification
GFI	Great Britain Companion Specification for Industry
GSME	Gas Smart Metering Equipment
HAN	Home Area Network
HCALCS	Home Area Network Connected Auxiliary Load Control Switch
ICHIS	Intimate Communications Hub Interface Specification
IHD	In-Home Display
ITCH	Instrumented Test Communications Hub
PPMID	Prepayment Interface Device
RF	Radio Frequency
SEC	Smart Energy Code
SMDA	Smart Meter Device Assurance
TAG	Testing Advisory Group
UIT	User Integration Testing
UEPT	User Entry Process Testing
WAN	Wide Area Network

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MP138 ‘DCC Service Testing in ETAD’

Annex A

Legal text – version 0.2

About this document

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

Section H 'DCC Services'

These changes have been redlined against Section H version 12.0.

Amend Section H8 as follows:

Maintenance of the DCC Systems

- H8.2 The DCC shall (insofar as is reasonably practicable) undertake Maintenance of the DCC Systems in such a way as to avoid any disruption to the provision of the Services (or any part of them).
- H8.3 Without prejudice to the generality of Section H8.2, the DCC shall (unless the Panel agrees otherwise and subject to any contrary provisions in the SEC Subsidiary Documents applying in relation to the SMETS1 SM WAN and/or the Systems of the SMETS1 Service Providers):
- (a) undertake Planned Maintenance of the DCC Systems only between 20.00 hours and 08.00 hours;
 - (b) limit Planned Maintenance of the Self-Service Interface to no more than four hours in any month; and
 - (c) limit Planned Maintenance of the DCC Systems generally (including of the Self- Service Interface) to no more than six hours in any month.
- H8.4 At least 20 Working Days prior to the start of each month, the DCC shall make available to Parties, to Registration Data Providers and ~~to the Panel to the Technical Architecture and Business Architecture Sub-Committee~~ a schedule of the Planned Maintenance for that month (subject to any contrary provisions in the SEC Subsidiary Documents applying in relation to the SMETS1 SM WAN and/or the Systems of the SMETS1 Service Providers). Such schedule shall set out (as a minimum) the following:
- (a) the proposed Maintenance activity (in reasonable detail);
 - (b) the parts of the Services that will be disrupted (or in respect of which there is a Material Risk of disruption) during each such Maintenance activity;
 - (c) the time and duration of each such Maintenance activity; and
 - (d) any associated risk that may subsequently affect the return of normal Services.
- H8.5 The Panel may (whether or not at the request of a Party and subject to any contrary provisions in the SEC Subsidiary Documents applying in relation to the SMETS1 SM WAN and/or the Systems of the SMETS1 Service Providers) request that the DCC reschedules any Planned Maintenance set out in a monthly schedule provided pursuant to Section H8.4. In making any such request, the Panel shall provide the reasons for such request to the DCC in support of the request. The DCC will take all reasonable steps to accommodate any such request.

- H8.6 As soon as reasonably practicable after the DCC becomes aware of any Unplanned Maintenance, the DCC shall notify the ~~Panel Technical Architecture and Business Architecture Sub-Committee~~, Parties and (insofar as they are likely to be affected by such Unplanned Maintenance) Registration Data Providers of such Unplanned Maintenance (and shall provide information equivalent to that provided in respect of Planned Maintenance pursuant to Section H8.4).
- H8.7 During the period of any Planned Maintenance or Unplanned Maintenance, the DCC shall provide Parties and (insofar as they are likely to be affected by such maintenance) Registration Data Providers with details of its duration and the expected disruption to Services to the extent they differ from the information previously provided.

DCC Internal System Changes

H8.8 Where the DCC is proposing to make a change to DCC Internal Systems, the DCC shall:

- (a) undertake an assessment of the likely impact on:
 - (i) Parties in respect of any potential disruption to Services; and/or
 - (ii) RDPs in relation to the sending or receipt of data pursuant to Section E (Registration Data),

that may arise as a consequence of the Maintenance required to implement the contemplated change;

- (b) where such assessment identifies that there is a Material Risk of disruption to Parties and/or RDPs, consult with Parties and/or RDPs (as applicable) and with the ~~Panel Technical Architecture and Business Architecture Sub-Committee~~ regarding such risk;
- (c) provide the Parties and RDPs the opportunity to be involved in any testing of the change to the DCC Internal Systems prior to its implementation; and
- (d) undertake an assessment of the likely impact of the contemplated change upon the security of the DCC Total System, Smart Metering Systems, and the Systems of Parties and/or RDPs.

Release Management

H8.9 The DCC shall ensure that it plans, schedules and controls the building, testing and deployment of releases of IT updates, procedures and processes in respect of the DCC Internal Systems and/or the Parse and Correlate Software in accordance with a policy for Release Management (the “DCC Release Management Policy”).

H8.10 The DCC shall ensure that the DCC Release Management Policy:

- (a) defines the scope of the matters that are to be subject to the policy in a manner consistent with the Service Management Standards;
- (b) includes a mechanism for setting priorities for different types of such matters;
- (c) defines periods of change-freeze where no such matters may be implemented; and

- (d) defines periods of notice to be given to Parties and RDPs prior to the implementation of such matters.

H8.11 The DCC shall make the DCC Release Management Policy available to Parties, RDPs and ~~the the Panel~~~~Technical Architecture and Business Architecture Sub-Committee~~. The DCC shall consult with Parties, RDPs and the ~~Technical Architecture and Business Architecture Sub-Committee before~~~~Panel before~~ making any changes to the DCC Release Management Policy.

H8.12 The DCC's obligation under Section H8.11 is in addition to its obligations in respect of Planned Maintenance and changes to DCC Internal Systems to the extent that the activity in question involves Planned Maintenance or changes to DCC Internal Systems.

Amend Section H10 as follows:

Business Continuity and Disaster Recovery Tests

H10.11 The DCC shall (subject to any contrary provisions in the SEC Subsidiary Documents applying in relation to the SMETS1 SM WAN and/or the Systems of the SMETS1 Service Providers):

- (a) from time to time, and at least once each year, carry out a Business Continuity and Disaster Recovery Test in order to assess whether the Business Continuity and Disaster Recovery Procedure remains suitable for achieving the objectives described at Section H10.9; and
- (b) following any such test, report to the Panel and the Authority on the outcome of the test, and on any proposals made by the DCC in relation to the Business Continuity and Disaster Recovery Procedure having regard to that outcome.

H10.12 Each Party shall provide the DCC with any such assistance and co-operation as it may reasonably request for the purpose of carrying out a Business Continuity and Disaster Recovery Test and confirming the operation of the Business Continuity and Disaster Recovery Procedure.

H10.12A Before notifying the Parties of each Business Continuity and Disaster Recovery Test, the DCC shall consult with the Parties and the ~~Panel~~~~Technical Architecture and Business Architecture Sub-Committee~~ regarding the Business Continuity and Disaster Recovery Test Schedule to ensure that (insofar as is reasonably practicable) the Business Continuity and Disaster Recovery Test is undertaken in such a way as to minimise any disruption to the provision of the Services (or any part of them). The DCC shall complete all necessary consultation prior to notifying Parties.

H10.12B The DCC shall notify each Party of its intention to carry out a Business Continuity and Disaster Recovery Test and provide each Party with a Business Continuity and Disaster Recovery Test Schedule at least 60 Working Days before the date on which such test is due to start. Where the DCC needs to amend the Business Continuity and Disaster Recovery Test Schedule following such notification and it is not reasonably practicable to give 60 Working Days' notice, it will provide such notice as far in advance as is reasonably practicable.

Amend Section H11 as follows (housekeeping change):

H11. PARSE AND CORRELATE SOFTWARE

Provision of Parse and Correlate Software

H11.1 -On receipt of a request to do so from any person, the DCC shall supply to that person a copy of the most recently released version of computer software (the “**Parse and Correlate Software**”) which:

- (a) has the functionality specified in Section H11.2;
- (b) has the characteristics specified in Section H11.3; and
- (c) is provided in the format specified in Section H11.4.

H11.2 The functionality specified in this Section H11.2 is that the software must enable any User to:

- (a) convert the relevant content of all Service Responses and Device Alerts (in each case only where generated from a Response or Alert originating from a SMETS2+ Device) into the format that is consistent with that set out in respect of them in the Message Mapping Catalogue; and
- (b) confirm that the content of any Pre-Command is substantively identical to the content of its associated Critical Service Request.

H11.3 The characteristics specified in this Section H11.3 are that:

- (a) the software is written using the Java programming language; and
- (b) the software is capable of operating on the version of the Java Virtual Machine/Run-time Environment prevailing at the time at which the design of that version of the software was finalised.

H11.4 The format specified in this Section H11.4 is that the software:

- (a) is provided as both:
 - (i) an executable file which includes everything required to enable the software to be installed on the systems of the person to whom it is provided in such a manner as not to have a material adverse effect on the operation of other software deployed within the same system environment; and
 - (ii) source software code; and
- (b) can be confirmed, on receipt by the person to whom it is provided:
- (c) as having been provided by the DCC; and

- (d) as being authentic, such that any tampering with the software would be apparent.

Amend Section H11.13 as follows (housekeeping change):

H11.13 Section H11.12 does not apply to the provision of assistance that is the responsibility of the DCC in accordance with the Incident Management Policy. The assistance referred to in Section H11.12 may include in particular assistance in respect of:

- (a) the development and testing of, and the provision of support for, a version of the Parse and Correlate Software which is capable of operating on a version of the Java Virtual Machine/Run-time Environment other than that prevailing at the time at which the design of the most recently released version of the Parse and Correlate Software was finalised;
- (b) the development and testing of, and the provision of support for, a version of the Parse and Correlate Software which meets any other User-specific requirements; and
- (c) the provision, in respect of more than two Application Servers, of support for the executable file referred to in Section H11.4(a)(i).

Amend Section H13.1 as follows (housekeeping change):

H13. PERFORMANCE STANDARDS AND REPORTING

Code Performance Measures

H13.1 Each of the following performance measures constitute a Code Performance Measure (to which the following Target Service Level and Minimum Service Level will apply, measured over the following Performance Measurement Period):

No.	Code Performance Measure	Performance Measurement Period	Target Service Level	Minimum Service Level
1	Percentage of On-Demand Service Responses delivered within the applicable Target Response Time.	monthly	99%	96%
2	Percentage of Future-Dated Service Responses delivered within the applicable Target Response Time.	monthly	99%	96%
3	Percentage of Alerts delivered within the applicable Target Response Time. Alerts consolidated in accordance with the Alert Management Mechanism will not be counted.	monthly	99%	96%
4	Percentage of Incidents which the DCC is responsible for resolving and which fall within Incident Category 1 or 2 that are resolved in accordance with the Incident Management Policy within the Target Resolution Time.	monthly	100%	85%

Managed by



5	Percentage of Incidents, measured and reported as a separate Code Performance Measure for each of Incident Categories 3, 4 and 5, which the DCC is responsible for resolving that are resolved in accordance with the Incident Management Policy within the Target Resolution Time.	monthly	90%	80%
5A	Percentage of Incidents which fall within Incident Category 3, 4 or 5 that are recorded on the Incident Management Log and assigned to a resolver within the Target Initial Response Time.	monthly	90%	80%
6	Percentage of time (in minutes) during which each DCC Interface (excluding the one listed in paragraph (f) of the definition of DCC Interface) is available during the Target Availability Period. There shall be a separate Code Performance Measure for each combination of DCC Interface, Region and the two relevant times of day (the first such relevant time of day being Monday-Friday 08.00-20.00 and Saturday 08.00-12.00; the second being every other time). For this purpose, a DCC Interface is only considered to be available where it and the DCC Systems on which it relies are fully available, such that those persons which are intended to be able to use the DCC Interface can use the full functionality which is intended to be available to them.	monthly	99.5%	98%
6A	Percentage of each of the Business Processes described in Section H13.1A which is delivered within the applicable Target Response Time. There shall be a separate Code Performance Measure for each combination of Business Processes and either Region (for SMETS2 ⁺) or SMETS1.	monthly	99%	96%
6B	Percentage of firmware images successfully delivered to Communication Hubs.	monthly	99%	96%
6C	Percentage of firmware image activations successfully implemented on Communication Hubs.	monthly	99%	96%

Amend Section H14.1 and 14.8 as follows:

H14. TESTING SERVICES

General Testing Requirements

H14.1 The DCC shall provide the following testing services (the “Testing Services”):

- (a) User Entry Process Tests;

- (b) SMKI and Repository Entry Process Tests;
- (c) Device and User System Tests;
- (d) Modification Proposal implementation testing (as described in Section H14.34);
- (e) DCC Internal Systems change testing (as described in Section H14.36);
- (f) RDP Entry Process Tests; ~~and~~
- (g) SMETS1 Pending Product Combinations Tests;
- (h) RF Noise Testing;
- (i) Interoperability and Innovation Events;
- (j) GFI Testing; and
- (k) Wired Instrumented Test Communications Hubs.

H14.2 The DCC shall make the Testing Services available, and shall provide the Testing Services:

- (a) in accordance with the Enduring Testing Approach Document and Good Industry Practice; and
- (b) between 08:00 hours and 18.00 hours Monday to Friday, and at any other time that it is reasonably practicable to do so (including where any DCC Service Provider has agreed to provide services at such time).

H14.3 The DCC shall act reasonably in relation to its provision of the Testing Services and shall facilitate the completion (in a timely manner) of tests pursuant to the Testing Services by each such person which is entitled to do so in accordance with this Section H14. Each Testing Participant shall comply with the Enduring Testing Approach Document with respect to the relevant Testing Services. The DCC shall publish on the DCC Website a guide for Testing Participants describing which persons are eligible for which Testing Services, and on what basis (including any applicable Charges).

H14.4 To the extent it is reasonably practicable to do so, the DCC shall allow persons who are eligible to undertake tests pursuant to the Testing Services to undertake those tests concurrently, or shall (otherwise) determine, in a non-discriminatory manner, the order in which such persons will be allowed to undertake such tests. Where any Testing Participant disputes the order in which persons are allowed to undertake tests pursuant to this Section H14.4, then the Testing Participant may refer the matter to the Panel. Where the DCC or any Testing Participant wishes to do so, it may refer the Panel's decision on such matter to the Authority for its determination (which shall be final and binding for the purposes of this Code).

H14.5 Each Party which undertakes tests pursuant to the Testing Services shall do so in accordance with Good Industry Practice. To the extent that such tests involve a Party accessing the DCC's

premises, the Party shall do so in compliance with the site rules and reasonable instructions of the DCC.

H14.6 The DCC shall be liable for any loss of or damage to the equipment of Testing Participants (fair wear and tear excepted) that occurs while such equipment is within the DCC's possession or control pursuant to the Testing Services; save to the extent that such loss or damage is caused by a breach of this Code (or the equivalent agreement under Section H14.7) by the Testing Participant.

H14.7 Where (in accordance with this Section H14) a person that is not a Party is eligible to undertake a category of Testing Services as a Testing Participant, the DCC shall not provide those Testing Services to that person unless it is bound by an agreement entered into with the DCC pursuant to this Section H14.7. Where a person who is a Testing Participant (but not a Party) requests a Testing Service, the DCC shall offer terms upon which such Testing Service will be provided. Such offer shall be provided as soon as reasonably practicable after receipt of the request, and shall be based on the Specimen Enabling Services Agreement (subject only to such variations from such specimen form as are reasonable in the circumstances).

General: Forecasting

H14.8 Each Testing Participant shall provide the DCC with as much prior notice as is reasonably practicable of that Testing Participant's intention to use any of the following Testing Services: User Entry Process Tests, SMKI and Repository Entry Process Tests, Device and User System Tests ~~and~~ SMETS1 Pending Product Combinations Tests and RF Noise Testing.

General: Systems and Devices

H14.9 The DCC shall provide such facilities as are reasonably required in relation to the Testing Services, including providing:

- (a) for access to the Testing Services either at physical test laboratories and/or remotely;
- (b) a reasonable number of Test Communications Hubs for use by Testing Participants at the DCC's physical test laboratories which represent each and every combination of HAN Variant and WAN Variant; and
- (c) a reasonable number of Devices (other than SMETS2+ Communications Hubs) for use by Testing Participants at the DCC's physical test laboratories, which Devices are to be:
 - (i) in the case of SMETS1 Devices as further described or set out in the Enduring Testing Approach Document; or
 - (ii) except for SMETS1 Devices, of the same Device Models as those selected pursuant to the Device Selection Methodology and/or such other Device Models as the Panel approves from time to time (provided that, where Test Stubs (or other alternative arrangements) were used then such Tests Stubs (or other alternative arrangements) will be used in place of Devices until the DCC agrees with the Panel which Device Models to use).

H14.10 Without prejudice to Sections H14.9(b) and (c), the DCC shall allow Testing Participants to use Devices they have procured themselves when using the Testing Services. The DCC shall make

storage facilities available at the DCC's physical test laboratories for the temporary storage by Testing Participants of such Devices (for no more than 30 days before and no more than 30 days after completion of the Testing Service for which such Devices may be expected to be used). The DCC shall ensure that such storage facilities are secure and only capable of access by persons authorised by the relevant Testing Participant.

H14.10A The DCC may require a Testing Participant to remove its Devices from a DCC physical test laboratory in accordance with the requirements set out in the Enduring Testing Approach Document. Any dispute between the DCC and a Testing Participant regarding the removal of such Devices (or the right to re-commence testing) may be referred to the Panel for its determination (which determination shall be final and binding for the purposes of this Code).

Add Section H14.46 - 14.55 as follows:

Device and User System Tests

H14.31 This Section H14.31 shall only apply in respect of SMETS1 Devices from 31 August 2018 or any such later date as the Secretary of State may direct further to a recommendation from the DCC to the Secretary of State following a consultation on a proposed date by the DCC with all SEC Parties and the SEC Panel. The DCC shall provide a service to enable Testing Participants:

- (a) to test the interoperability of SMETS2+ Devices (other than those comprising Communications Hubs) with the DCC Systems and with the Test Communications Hubs provided as part of the Testing Services, such that those Devices are able to respond to Commands received from or via the DCC in accordance with the requirements defined in the GB Companion Specification;
- (b) to test the interoperability of SMETS1 Devices with the DCC Systems, such that those Devices are able to respond to Instructions received from or via the DCC such that the necessary Equivalent Steps are taken (provided that such service need only be provided by the DCC in respect of combinations of SMETS1 Device Models that are listed on the SMETS1 Eligible Product Combinations);
- (c) to test the interoperability of User Systems with the DCC Systems, including via the DCC User Interface and the Self-Service Interface;
- (d) to test simultaneously the interoperability of User Systems and SMETS2+ Devices (other than those comprising Communications Hubs) with the DCC Systems and with the Test Communications Hubs provided as part of the Testing Services; and
- (e) to test simultaneously the interoperability of User Systems and SMETS1 Devices (excluding combinations of SMETS1 Devices that are not listed on the SMETS1 Eligible Product Combinations) with the DCC Systems,

which Testing Services, except in respect of (c) above, shall (subject to the Testing Participant agreeing to pay any applicable Charges, as further described in the Enduring Testing Approach Document) include the provision of a connection to a simulation of the SMETS2+ SM WAN for the purpose of such tests as further described in the Enduring Testing Approach Document (save to the extent the connection is required where the DCC is relieved from its obligation to provide Communication Services pursuant to the Statement of Service Exemptions). For the avoidance of doubt, the DCC shall not be

obliged by this Section H14.31 to provide a connection to a simulation of the SMETS1 SM WAN. References to particular Systems in this Section H14.31 may include a simulation of those Systems (rather than the actual Systems).

H14.32 Each Party is eligible to undertake Device and User System Tests. Any Manufacturer (whether or not a Party) is eligible to undertake those Device and User System Tests described in Section H14.31(a) and (b); provided that, in the case of any such tests that require the use of a DCC Gateway Connection, the Manufacturer must be a Party. Any person providing (or seeking to provide) goods or services to Parties or Manufacturers in respect of Devices is eligible to undertake those Device and User System Tests described in Section H14.31(a) and (b); provided that, in the case of any such tests that require the use of a DCC Gateway Connection, the person must be a Party. A Party undertaking the Device and User System Tests described in Section H14.31(c) is entitled to undertake tests equivalent to any or all of the User Entry Process Tests and SMKI and Repository Entry Process Tests, in respect of which:

- (a) the DCC shall, at the Party's request, assess whether the test results would meet the requirements of all or part of the applicable User Entry Process Tests and/or SMKI and Repository Entry Process Tests;
- (b) the DCC shall, at the Party's request, provide a written statement confirming the DCC's assessment of whether the test results would meet the requirements of all or part of the applicable tests; and
- (c) the Party may, where it disputes the DCC's assessment, refer the matter to the Panel for its determination (which shall be final and binding for the purposes of this Code).

H14.33 The DCC shall, on request by a Testing Participant, take all reasonable steps to offer additional support to that Testing Participant (subject to such Testing Participant agreeing to pay any applicable Charges) in understanding and resolving issues associated with:

- (a) the DCC Total System and the results of such Testing Participant's Device and User System Tests;
- (b) where the Testing Participant is a Party, the Systems of the Testing Participant that are (or are intended to be) User Systems; and/or
- (c) communications between the DCC and any Device or between Devices which comprise (or which the Testing Participant intends will comprise) a Smart Metering System.

H14.33A The additional Testing Services provided for in Section H14.33 are without prejudice to the DCC's obligations in respect of Testing Issues, Incidents and Problems.

Modification Implementation Testing

H14.34 Where an approved Modification Proposal provides for the DCC to provide testing services as part of the Modification Proposal's implementation, then such testing shall be undertaken as a Testing Service pursuant to this Section H14.34.

H14.35 The Parties which are eligible, or obliged, to participate in such testing shall be determined in accordance with Section D (Modification Process), and either set out in this Code or established via a process set out in this Code.

DCC Internal System Change Testing

H14.36 Where, pursuant to Section H8.8 (DCC Internal Systems Changes), a Party or an RDP is involved in testing of changes to the DCC Internal Systems, then such testing shall not be subject to the requirements of Section H14.3, Section H14.4 and Sections H14.6 to H14.11 (inclusive), but such Party or RDP may nevertheless raise a Testing Issue in respect of the tests (and the references to Testing Participant in Sections H14.37 to H14.44 shall be interpreted accordingly).

SMETS1 Pending Product Combinations Tests

H14.36A This Section H14.36A shall only apply in respect of SMETS1 Devices from 31 August 2018 or any such later date as the Secretary of State may direct further to a recommendation from the DCC to the Secretary of State following a consultation on a proposed date by the DCC with all SEC Parties and the SEC Panel. The DCC shall provide services (the "**SMETS1 Pending Product Combinations Tests**") whereby a Party or a Manufacturer (being the relevant Testing Participant) can from time to time request that the DCC determines whether or not testing is required and, where it determines that testing is required, tests one or more combinations of SMETS1 Device Models and communication services provider that are not at that time listed on the SMETS1 Eligible Product Combinations in order to demonstrate whether the DCC is able to successfully process SMETS1 Service Requests and relevant SMETS1 Alerts in respect of them (subject to Section H14.36C(c)).

H14.36B Where requested in accordance with Section H14.36A, the DCC shall undertake, and facilitate the Testing Participant's participation in, the SMETS1 Pending Product Combinations Tests in respect of the requested combination(s) of SMETS1 Device Models as soon as reasonably practicable. The DCC shall then notify the relevant Testing Participant whether the DCC is able to successfully process SMETS1 Service Requests and relevant SMETS1 Alerts in respect of them, without needing to make material changes to the DCC Systems and/or modifications to this Code.

H14.36C Where the DCC notifies a Testing Participant that the DCC is not able to successfully process SMETS1 Service Requests and relevant SMETS1 Alerts in respect of a combination of SMETS1 Device Models without needing to make material changes to the DCC Systems and/or modifications to this Code, then the DCC shall:

- (a) provide the relevant Testing Participant with reasonable details of the reasons why the DCC is not able to do so, and of the changes to the DCC Systems and/or modifications to this Code which would be required in order to enable the DCC to do so (in each case, to the extent that the DCC has been able to identify such reasons and changes and/or modifications, having taken reasonable steps to identify them);
- (b) provide the relevant Testing Participant with such reasonable support as they may request in understanding the issues identified by the DCC;
- (c) not be obliged to provide SMETS1 Pending Product Combinations Tests to the same Testing Participant in respect of the same combination of SMETS1 Device Models unless and until

the relevant changes have been made to the DCC System and/or the relevant modifications have been made to this Code; and

- (d) make available in accordance with the Enduring Testing Approach Document such details regarding the relevant combination of SMETS1 Device Models as is required in accordance with the Enduring Testing Approach Document.

H14.36D Where the DCC is able to successfully process SMETS1 Service Requests and relevant SMETS1 Alerts in respect of a combination of SMETS1 Device Models without needing to make material changes to the DCC Systems and/or modifications to this Code, then the DCC shall add that combination of Device Models to the SMETS1 Eligible Product Combinations.

H14.36E The DCC and the relevant Testing Participant in respect of the SMETS1 Pending Product Combinations Tests shall comply with any and all additional obligations concerning SMETS1 Pending Product Combinations Tests set out in the Enduring Testing Approach Document.

General: Testing Issue Resolution Process

H14.37 Each Testing Participant undertaking tests pursuant to this Section H14 is entitled to raise a Testing Issue in respect of those tests. Each Testing Participant shall take reasonable steps to diagnose and resolve a Testing Issue before raising it in accordance with this Section H14.

H14.38A Testing Participant that wishes to raise a Testing Issue shall raise it with the relevant DCC Service Provider (as identified by the DCC from time to time) in accordance with a reasonable and not unduly discriminatory procedure, which is to be established by the DCC and provided to the Panel from time to time (which the Panel shall publish on the Website).

H14.39 Where a Testing Participant raises a Testing Issue, the DCC shall ensure that the relevant DCC Service Provider shall (as soon as reasonably practicable thereafter):

- (a) determine the severity level and priority status of the Testing Issue;
- (b) inform the Testing Participant of a reasonable timetable for resolution of the Testing Issue consistent with its severity level and priority status; and
- (c) provide its determination (in accordance with such timetable) to the Testing Participant on the actions (if any) to be taken to resolve the Testing Issue.

H14.40 Pursuant to H14.39, the DCC shall share with categories of Testing Participant any information (provided that the identities of the Testing Participant and, where relevant, the Device's Manufacturer are anonymised) relating to the Testing Issue which is likely to be of use to those categories of Testing Participants (provided that no such information should be shared to the extent it poses a risk of Compromise to the DCC Total System, User Systems, RDP Systems and/or Devices).

H14.41 Where a Testing Participant is dissatisfied with any of the determinations under Section H14.39 (or the speed with which any such determination is made), the Testing Participant may refer the

matter to the DCC. On such a referral to the DCC, the DCC shall (as soon as reasonably practicable thereafter):

- (a) consult with the Testing Participant and any other person as the DCC considers appropriate;
- (b) either, depending on the subject matter of the disagreement:
 - (i) direct the DCC Service Provider to more quickly provide its determination of the matters set out in Section H14.39(a), (b) and/or (c); or
 - (ii) make the DCC's own determination of the matters set out in Section H14.39(a), (b) and/or (c);
- (c) notify the Panel of the DCC's direction or determination under (b) above; and
- (d) share with categories of Testing Participant any information (provided that the identities of the Testing Participant and, where relevant, the Device's Manufacturer are anonymised) relating to the Testing Issue which is likely to be of use to those categories of Testing Participants (provided that no such information should be shared to the extent it poses a risk of Compromise to the DCC Total System, User Systems, RDP Systems and/or Devices).

H14.42 Where the Testing Participant (or any Party) disagrees with the DCC's determination pursuant to Section H14.41 of the matters set out at Section H14.39(c) (but not otherwise), then the Testing Participant (or Party) may request that the DCC refers the matter to the Panel for its consideration (provided that the identities of the Testing Participant and, where relevant, the Device's Manufacturer are anonymised).

H14.43 Where a matter is referred to the Panel for its consideration pursuant to Section H14.42, the Panel shall consider the matter further to decide upon the actions (if any) to be taken to resolve the Testing Issue, unless the matter relates to testing undertaken pursuant to Section T (Testing During Transition), in which case the Panel shall notify the Secretary of State and shall consider the matter further and make such a decision only where, having received such a notification, the Secretary of State so directs. Where the Panel considers the matter further, it may conduct such further consultation as it considers appropriate before making such a decision. Such a decision may include a decision that:

- (a) an aspect of the Code could be amended to better facilitate achievement of the SEC Objectives;
- (b) an aspect of the DCC Systems is inconsistent with the requirements of this Code;
- (c) an aspect of one or more Devices is inconsistent with the requirements of this Code; or
- (d) an aspect of the User Systems or the RDP Systems is inconsistent with the requirements of this Code.

H14.44 The Panel shall publish each of its decisions under Section H14.43 on the Website; provided that the identities of the Testing Participant and (where relevant) the Device's Manufacturer are anonymised, and that the Panel shall remove or redact information where it considers that

publishing such information would be prejudicial to the interests of one or more Parties, or pose a risk of Compromise to the DCC Total System, User Systems, RDP Systems and/or Devices.

H14.45A decision of the Panel under Section H14.43 is merely intended to facilitate resolution of the relevant Testing Issue. A decision of the Panel under Section H14.43 is without prejudice to any future decision by the Change Board and/or the Authority concerning a Modification Proposal, by the Secretary of State in exercising its powers under section 88 of the Energy Act 2008, by the Authority concerning the DCC's compliance with the DCC Licence, or by the Panel under Section M8 (Suspension, Expulsion and Withdrawal).

Radio Frequency Noise Testing

H14.46 The DCC shall provide a Testing Service (referred to as RF Noise Testing) to enable Testing Participants to test ESME or a Communication Hub Hot Shoe to ensure it meets the requirements of the current Intimate Communications Hub Interface Specification (ICHIS) published on the DCC Website in accordance with SEC Section H12.

H14.47 The following shall apply in respect of RF Noise Testing:

- (a) the following persons shall be eligible to undertake RF Noise Testing: Parties and persons that have signed agreements based on the Specimen Enabling Services Agreement (subject only to such variations from such specimen form as are reasonable in the circumstances, including so as to require compliance with this Section H14);
- (b) Testing Participants undertaking RF Noise Testing must each comply with such reasonable supplemental obligations as the DCC may notify to them from time to time (provided that such obligations are not inconsistent with the provisions of the Code that are in effect at that time); and
- (c) the Testing Issue Resolution Process in Section H14.47 to H14.55 (General: Testing Issue Resolution Process) shall not apply to RF Noise Testing, but DCC must take reasonable steps to provide support and assistance to a person undertaking RF Noise Testing in order to assist that person in resolving Testing Issues encountered when undertaking RF Noise Testing.

H14.46H14.48 The DCC and the relevant Testing Participant in respect of the RF Noise Testing shall comply with any and all additional obligations concerning RF Noise Testing set out in the Enduring Testing Approach Document.

Interoperability and Innovation Events

H14.49The DCC shall provide a Testing Service (referred to as Interoperability and Innovation Events) that provides a platform for Device Manufacturers to test connectivity, interoperability, interchangeability and functionality between SMETS2+ Home Area Network (HAN) Devices.

H14.50The DCC and the relevant Testing Participants in respect of Interoperability and Innovation Events shall comply with any and all additional obligations concerning Interoperability and Innovation Events set out in the Enduring Testing Approach Document.

GFI Testing

H14.51 The DCC shall provide types of Testing Tools (referred to as GBCS for Industry (GFI)) to enable Testing Participants to test their products against an interpretation of DCC Total Systems, including an interpretation of the GBCS standard, such that those Devices are able to respond to Commands received in accordance with the requirements defined in the GB Companion Specification.

H14.52 The following shall apply in respect of GFI Testing:

- (a) the following persons shall be eligible to undertake GFI Testing: Parties and persons that have signed agreements based on the Specimen Enabling Services Agreement (subject only to such variations from such specimen form as are reasonable in the circumstances, including so as to require compliance with this Section H14);
- (b) the references in H14.42 to “Communications Hubs”, “DCC Systems” and “Devices” shall be interpreted as including references to prototypes of simulations of those things (and GFI Testing shall not include communication via the SM WAN, or a simulation of the SM WAN);
- (c) Testing Participants undertaking GFI Testing must each comply with such reasonable supplemental obligations as the DCC may notify to them from time to time (provided that such obligations are not inconsistent with the provisions of the Code that are in effect at that time); and
- (d) the Testing Issue Resolution Process in Section H14.47 to H14.55 (General: Testing Issue Resolution Process) shall not apply to GFI Testing, but DCC must take reasonable steps to provide support and assistance to a person undertaking GFI Testing in order to assist that person in resolving Testing Issues encountered when undertaking GFI Testing.

H14.53 The DCC and the relevant Testing Participant in respect of the GFI Testing shall comply with any and all additional obligations concerning GFI Testing set out in the Enduring Testing Approach Document.

Wired Instrumented Test Communications Hubs

H14.54 The DCC shall provide a Testing Service (referred to as Wired ITCH) to enable Testing Participants to perform interoperability testing with SMETS2+ Test Communications Hub that will facilitate the sending of DUIS Commands to HAN Devices.

H14.55 The DCC and the relevant Testing Participant in respect of the Wired ITCH shall comply with any and all additional obligations concerning Wired ITCH set out in the Enduring Testing Approach Document.

Amend Section H16 as follows (housekeeping change):

H16. INTEROPERABILITY CHECKER SERVICE

The Responsibility of Supplier Parties

H16.1 Each Supplier Party shall ensure that Energy Consumers at premises supplied by it with electricity and/or gas shall:

- (a) have access to the information described in Section H16.2;
- (b) be able to access that information in the manner described in Section H16.4; and
- (c) have such access in such manner during the period determined in accordance with Section H16.5.

H16.2 The information described in this Section (the "**Interoperability Data**") is, in respect of each premises, information as to:

- (a) whether the supply of electricity or the supply of gas (as determined by the request made by the Energy Consumer) to the premises is made through an Enrolled Smart Metering System; and
- (b) where either the supply of electricity or the supply of gas is made through an enrolled Smart Metering System:
 - (i) whether the supply of other fuel is also made through an Enrolled Smart Metering System;
 - (ii) the name of the Electricity Supplier or the name of the Gas Supplier (or both as the case may be);
 - (iii) whether any such Enrolled Smart Metering System is a SMETS1 Smart Metering System or a SMETS2+ Smart Metering System; and
 - (iv) where any such Enrolled Smart Metering System is a SMETS1 Smart Metering System, the name of each electricity and/or gas supplier (as the case may be) which has notified the DCC that it is its policy, if it commences to supply premises at which a Smart Metering System of that type is installed, to operate that Smart Metering System in Smart Mode.

Section K 'Charging Methodology'

These changes have been redlined against Section K version 10.0.

Amend Section K as follows:

K7.5 The Explicit Charging Metrics for each Party and the Charging Period for each month are as follows:

- (a) ('security assessments') an obligation to pay arising during that Charging Period in respect of that Party pursuant to Section G8.51 (Users: Obligation to Pay Charges) in relation to User Security Assessments, Follow-up Security Assessments, User Security Assessment Reports or the activities of the Independent Security Assurance Service Provider;
- (b) ('privacy assessments') an obligation to pay arising during that Charging Period in respect of that Party pursuant to Section I2.40 (Users: Obligation to Pay Charges) in relation to Full Privacy Assessments, Random Sample Privacy Assessments, Privacy Assessment Reports or the activities of the Independent Privacy Auditor;
- (c) ('LV gateway connection') an obligation to pay arising during that Charging Period in accordance with an offer for a DCC Gateway LV Connection accepted by that Party pursuant to Section H15 (DCC Gateway Connections), including where the obligation to pay is preserved under Section H15.19(b) (Ongoing Provision of a DCC Gateway Connection);
- (d) ('HV gateway connection') an obligation to pay arising during that Charging Period in accordance with an offer for a DCC Gateway HV Connection accepted by that Party pursuant to Section H15 (DCC Gateway Connections), including where the obligation to pay is preserved under Section H15.19(b) (Ongoing Provision of a DCC Gateway Connection);
- (e) ('gateway equipment relocation') an obligation to pay arising during that Charging Period as a result of a request by that Party to relocate DCC Gateway Equipment under Section H15.27 (DCCGateway Equipment);
- (f) ('elective service evaluations') an obligation to pay arising during that Charging Period under the terms and conditions accepted by that Party for a Detailed Evaluation in respect of potential Elective Communication Services pursuant to Section H7.8 (Detailed Evaluations of Elective Communication Services);
- (g) ('P&C support') an obligation to pay arising during that Charging Period under the terms and conditions accepted by that Party in relation to that Party's use or implementation of the Parse and Correlate Software pursuant to Section H11.12 (Provision of Support & Assistance to Users);

- (h) ('*SM WAN for testing*') an obligation to pay arising during that Charging Period from the acceptance by that Party of the charges offered by the DCC to provide a connection to a simulation of the SM WAN pursuant to Section H14.31 (Device and User System Testing);
- (i) ('*additional testing support*') an obligation to pay arising during that Charging Period from the acceptance by that Party of the charges offered by the DCC to provide additional testing support to that Party pursuant to Section H14.33 (Device and User System Testing);
- (j) ('*communication services*') the number of each of the Services identified in the DCC User Interface Services Schedule which have been provided to that Party during that Charging Period;
- (k) ('*CH non-standard delivery*') an obligation to pay arising during that Charging Period as a result of the request by that Party for non-standard Communications Hub Product delivery requirements pursuant to Section F6.17 (Non-Standard Delivery Options);
- (l) ('*CH stock level charge*') the number (to be measured at the end of that Charging Period) of Communications Hubs that have been delivered to that Party under Section F6 (Delivery and Acceptance of Communications Hubs) and for which none of the following has yet occurred: (i) identification on the Smart Metering Inventory as 'installed not commissioned' or 'commissioned'; (ii) rejection in accordance with Section F6.10 (Confirmation of Delivery); (iii) delivery to the DCC in accordance with Section F8 (Removal and Return of Communications Hubs); or (iv) notification to the DCC in accordance with Section F8 (Removal and Return of Communications Hubs) that the Communications Hub has been lost or destroyed;
- (m) ~~not used~~; ('*GFI Testing*') the number of each of the types of GFI Testing tools which have been delivered to that Party during that Charging Period under Section H14 (Testing Services) and in accordance with Section 15 of Appendix J (Enduring Testing Approach Document);
- (n) ('*CH auxiliary equipment*') the number of each of the types of Communications Hub Auxiliary Equipment which have been delivered to that Party during that Charging Period under Section F6 (Delivery and Acceptance of Communications Hubs), and which have not been (and are not) rejected in accordance with Section F6.10 (Rejected Communications Hub Products) or (in the case of the Communications Hub Auxiliary Equipment to which Section 7.8 applies (Ownership of and Responsibility for Communications Hub Auxiliary Equipment)) returned, or notified as lost or destroyed, for a reason which is a CH Pre-Installation DCC Responsibility;
- (o) ('*CH returned and redeployed*') the number of Communications Hubs which have been returned by that Party during that Charging Period for a reason which is a CH User Responsibility, and which have been (or are intended to be) reconditioned for redeployment pursuant to Section F8 (Removal and Return of Communications Hubs);

- (p) ('CH returned not redeployed') the number of Communications Hubs which have been returned, or notified as lost or destroyed, by that Party during that Charging Period for a reason which is a CH User Responsibility, and which have not been (and are not intended to be) reconditioned for redeployment pursuant to Section F8 (Removal and Return of Communications Hubs);
- (q) ('CH wrong returns location') an obligation to pay arising during that Charging Period as a result of the return by that Party of Communications Hubs to the wrong returns location as referred to in Section F8.9 (Return of Communications Hubs);
- (r) ('test comms hubs') the number of Test Communications Hubs delivered to that Party during that Charging Period, and which have not been (and are not) returned to the DCC in accordance with Section F10.8 (Ordering, Delivery, Rejection and Returns);
- (s) ('additional CH Order Management System accounts') the number of additional CH Order Management System accounts made available to that Party during that Charging Period in accordance with Section F5.23 (CH Order Management System Accounts);
- (t) ('shared solution Alt HAN Equipment') the number (as measured at the end of that Charging Period) of MPANs associated with premises supplied with electricity by that Party and of MPRNs associated with premises supplied with gas by that Party, in respect of each of which premises (except where the Alt HAN Inventory records that Party as having elected to use Opted-out Alt HAN Equipment at that time) Central Shared Solution Alt HAN Equipment is installed;
- (u) ('point-to-point Alt HAN Equipment') the number (as measured at the end of that Charging Period) of MPANs associated with premises supplied with electricity by that Party and of MPRNs associated with premises supplied with gas by that Party, in respect of each of which premises (except where the Alt HAN Inventory records that Party as having elected to use Opted-out Alt HAN Equipment at that time) Central Point-to-Point Alt HAN Equipment is installed; and
- (v) ('stock level point-to-point Alt HAN Equipment') the number of items of Central Point-to-Point Alt HAN Equipment (as measured at the end of that Charging Period) delivered to that Party but not installed.
- (w) ('RF Noise Testing') an obligation to pay arising during that Charging Period from the acceptance by that Party of the charges offered by the DCC to provide RF Noise Testing pursuant to Section H14.37 (Radio Frequency Noise Testing).

Schedule 7 ‘Specimen Enabling Services Agreement’

These changes have been redlined against Schedule 7 version 7.0.

Amend Schedule 1 as follows:

Schedule 1 – Enabling Services

[The Enabling Services shall comprise the provision of Test Communications Hubs in accordance with Section F10 (Test Communications Hubs). The DCC and the Participant shall each comply with their respective obligations set out or referred to in that Section F10 (the Participant complying with those obligations assigned to TCH Participants).]

[The Enabling Services shall comprise the provision of either or both those Device and User System Tests described in Section H14.31(a) and (b) (Device and User System Tests) in accordance with Section H14 (Testing Services). The DCC and the Participant shall each comply with their respective obligations set out or referred to in that Section H14 (the Participant complying with those obligations assigned to Testing Participants).]

[The Enabling Services shall comprise the provision of SMETS1 Pending Product Combinations Tests in accordance with Section H14 (Testing Services). The DCC and the Participant shall each comply with their respective obligations set out or referred to in that Section H14 (the Participant complying with those obligations assigned to Testing Participants).]

[The Enabling Services shall comprise the provision of RF Noise Testing in accordance with Section H14 (Testing Services). The DCC and Participant shall each comply with their respective obligations set out or referred to in that Section H14 (the Participant complying with those obligations assigned to Testing Participants).]

[The Enabling Services shall comprise the provision of Interoperability and Innovation Events in accordance with Section H14 (Testing Services). The DCC and Participant shall each comply with their respective obligations set out or referred to in that Section H14 (the Participant complying with those obligations assigned to Testing Participants).]

[The Enabling Services shall comprise the provision of GFI Testing in accordance with Section H14 (Testing Services). The DCC and Participant shall each comply with their respective obligations set out or referred to in that Section H14 (the Participant complying with those obligations assigned to Testing Participants).]

Appendix J 'Enduring Testing Approach Document'

These changes have been redlined against Appendix J version 2.0.

Amend Appendix J6 as follows:

6 Requirements for Use of DCC Test Labs

- 6.1 Pursuant to Section H14.9(a), the DCC shall make available the DCC's physical test laboratories to Testing Participants to conduct User Entry Process Tests, Device and User System Tests, Modification Proposal implementation testing, ~~and~~ DCC Internal Systems change testing. Interoperability and Innovation Events and RF Noise.
- 6.2 Where a Testing Participant is performing tests in a DCC physical test laboratory, it must comply with any reasonable supplemental terms and conditions that are required by the DCC and notified prior to testing which may include:
- a) identification and authorisation of the individual(s) requiring access to the DCC physical test laboratory;
 - b) requirements to maintain confidentiality of information;
 - c) policies relating to the acceptable use of the laboratory and equipment; and
 - d) requirements to follow:
 - (i) health and safety guidance for test laboratories;
 - (ii) security guidance; and
 - (iii) training on use of test laboratories and installation of Devices in the spaces provided.
- 6.3 Where DCC considers that the Testing Participant has breached any SEC obligations relating to the use of a Testing Service at the physical test laboratory it shall notify the Testing Participant to that effect. The DCC and Testing Participant shall use reasonable steps to rectify the situation. Where DCC considers that the situation has not been rectified the DCC may request that the Testing Participant shall immediately remove its Devices from the Test Lab and the Testing Participant shall comply with such a request. DCC will provide the Testing Participant with:
- a) the reason(s) for this instruction; and

- b) the steps that must be taken and the evidence required, in order for the Participant to re-commence testing.
- 6.4 A Testing Participant may dispute the reasons for the instruction in clause a) or b) to the Panel and the DCC and Testing Participant shall comply with any determination.
- 6.5 Where a Testing Participant wishes to install their own devices in a DCC physical test laboratory, the Testing Participant must provide the following to the DCC prior to installing a device in a DCC physical test laboratory:
- a) in the case of SMETS2+ Devices only, where a Testing Participant reasonably believes that devices do not conform to SMETS2+ that any non-compliant aspects are notified to, and agreed with, the DCC (such agreement not to be unreasonably withheld). Supporting information should be provided, including evidence of testing that has been undertaken, which could include the use of GIT for Industry;
 - b) evidence that all the supplied devices are safe to store, install, operate and decommission. This may be in the form of a statement of compliance with the relevant parts of the CE marking or equivalent; and
 - c) confirmation that the devices have been produced in accordance with a recognised quality assurance process and a defined testing issue management and configuration management process.
- 6.6 Where a Testing Participant wishes to install their own Devices in a DCC physical test laboratory, the Testing Participant must:
- a) remove devices from the DCC physical test laboratory by 17:00 on the last day of the allocated test slot; and
 - b) comply with any other reasonable restrictions notified by the DCC, which the DCC shall notify to a Testing Participant when informing them that their requested test slot is available.
- 6.7 For the purpose of Section H14.10, storage space requirements for equipment shall be arranged between the DCC and the Testing Participant when making application to use the physical test laboratory. Pursuant to Section H14.10, the DCC will store at its physical test laboratories any number of Devices that a Testing Participant has procured itself that the DCC can reasonably accommodate.
- 6.8 In relation to testing being undertaken in a DCC physical test laboratory:
- a) without prejudice to the DCC's obligations under Section M4 (Confidentiality), each

Testing Participant shall take reasonable steps to preserve the confidentiality of the Testing Participant's Confidential Information;

- b) no Testing Participant shall attempt to discover, overhear or obtain Data regarding testing being conducted by other Testing Participants in the DCC physical test laboratory; and
- c) (without prejudice to (b) above) no Testing Participant shall disclose or use any Data of the DCC or any other Testing Participant that the first Testing Participant discovers, overhears or obtains in the course of using the DCC's physical test laboratory.

Amend Appendix J7 as follows:

7 User Entry Process Tests

7.1 In accordance with Section H14.9, DCC physical test laboratories will house sets of Devices or the DCC shall provide test stubs for SMETS2+ Devices, with a set consisting of:

- a) For tests in respect of SMETS2+ Devices:
 - (i) one Test Communications Hub;
 - (ii) one Electricity Smart Meter; and
 - (iii) one Gas Smart Meter.
- b) For tests in respect of SMETS1 Devices, two sets of Devices comprising Device Model Combinations that are on the list of Eligible Product Combinations, comprising one of ~~each of~~ the following:
 - (i) a Communications Hub, an Electricity Smart Meter, a Gas Smart Meter and an IHD; ~~or and~~
 - (ii) a Communications Hub, an Electricity Smart Meter, a Gas Smart Meter and a SMETS1 PPMID.

7.2 DCC shall allocate a number of spaces in the DCC physical test laboratory, together with Device sets to the Testing Participant, as agreed at the User Entry Process Tests initiation meeting, according to the following allocation schedule:

- a) Parties that are Affiliates undertaking UEPT in the User Roles of Import Supplier and / or Gas Supplier will collectively be allocated a total of two SMET2+ Device sets and two SMETS1 Device sets to undertake UEPT in those User Roles;
- b) Parties that are Affiliates undertaking UEPT in the User Role of Export Supplier will

collectively be allocated a total of two SMETS2+ Device sets and two SMETS1 Device sets to undertake UEPT in that User Role;

- c) Parties that are Affiliates undertaking UEPT in the User Roles of Electricity Distributor and / or Gas Transporter will collectively be allocated a total of two SMETS2+ Device sets and two SMETS1 Device sets to undertake UEPT in those User Roles. Where Parties that are Affiliates hold Electricity Distribution Licences and/or Gas Transportation Licences in different Regions, in the case of SMETS2+ Device sets, such Affiliates shall be offered on request two Device sets collectively in relation to each Region; and
- d) Parties that are Affiliates undertaking UEPT in the User Role of Other User will collectively be allocated a total of two SMETS2+ Device sets and two SMETS1 Device sets to undertake UEPT in that User Role.

7.3 The Device sets allocated for the conduct of User Entry Process Tests shall not be used for other testing without the agreement of DCC, such agreement not to be unreasonably withheld.

Add Appendix J14-17 as follows:

14 Radio Frequency Noise Testing

14.1 RF Noise Testing shall be undertaken to the requirements as set out in the current Intimate Communications Hub Interface Specification (ICHIS) and the associated ICHIS Test Specification published on the DCC Website.

14.2 DCC shall provide a reasonable number of each Communications Hub Antenna Structure (CHAS) test device listed in the current ICHIS to Testing Participants for the purposes of RF Noise Testing.

14.3 RF Noise Testing shall also provide the ability for DCC to test new CHAS test devices not yet listed in the current ICHIS with SMETS2+ ESME and Communications Hub Hot Shoe Devices upon agreement with the relevant Testing Participant.

14.4 Where a Testing Participant requests RF Noise Testing, the DCC shall provide confirmation that it can accommodate the request and a quotation for the Charges associated with the service.

14.5 Where a Testing Participant wishes to accept the quotation for RF Noise Testing, the Testing Participant shall notify the DCC.

14.6 Where RF Noise Testing is undertaken at the DCC Test Labs then Section 6 will apply.

15 Interoperability and Innovation Events

- 15.1 Testing Participants will be notified of the schedule of events and issued invitations to attend by DCC. Invitations to attend shall be issued via e-mail at least one month prior to the event.
- 15.2 The DCC shall notify any terms relating to the attendance of Interoperability and Innovation Events to each Testing Participant prior to the attendance of such an event.
- 15.3 Where an Interoperability and Innovation Event is held at the DCC Test Labs then Section 6 will apply.
- 15.4 No certification or accreditation is provided by attending these events.

16 GFI Testing

- 16.1 DCC shall develop and make available via the DCC Website a policy describing the provisions and allocation requirements for types of GFI Testing.
- 16.2 Testing Participant shall request GFI Testing Tools in accordance with the GFI Testing Policy.
- 16.3 Where a Testing Participant requests GFI Testing outside of the provisions and allocation requirements set out in the GFI Testing Policy, DCC shall provide confirmation that it can accommodate the request and a quotation for the Charges of the service.
- 16.4 Where a Testing Participant wishes to accept the quotation for GFI Testing, the Testing Participant shall notify the DCC.

17 Wired Instrumented Test Communications Hub (ITCH)

- 17.1 The DCC shall make available to Testing Participants Dual Band SMETS2+ Instrumented Test Communication Hubs (ITCHs) which are a Communications Hub (CH) variant in which the SM-WAN interface is disabled. The Wired ITCH will contain the capability to be connected to a test environment Personal Computer (PC) via a wired interface. This will enable a Testing Participants to exchange messages, responses and alerts between the PC and the CH without the use of a WAN network.
- 17.2 Testing Participants may order Wired ITCHs in accordance with SEC Section F10.

Definitions & Interpretation	
<u>Communications Hub Antenna Structure (CHAS)</u>	<u>means a unit which is used for testing against the Intimate Communications Hub Interface Specification (ICHIS) Test Specification.</u>
GIT for Industry	means a test tool provided by DCC to validate implementation of GBCS by a Device.
Quality Gate Checklist	means a checklist document used to support assessment whether criteria have been met.
Testing Issue Management Tool	means a test management tool that has the ability to log and track Testing Issues.
<u>Testing Participants</u>	<u>means, in respect of each Testing Service, the persons (whether or not they are Parties) who are entitled to undertake such tests, as described in Section H14 (Testing Services).</u>

GFI

Provision and Allocation Policy

Version:

v0.4

Date:

19/01/2021

Author:

DCC Devices Team

Classification:

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1 Overview

GBCS Interface Testing Tool for Industry (GFI) is a software tool provided by Smart DCC to enterprises who wish to check whether their interpretation of the Great Britain Specification Companion (GBCS) for Smart Meters is consistent with Smart DCC's. GFI has a library of Use Cases in support of GBCS over a ZigBee Home Area Network (HAN) and, in addition to the library of Use Cases, GFI allows end users to create new GBCS Use Cases or extend the existing ones.

This policy will only apply to orders placed on or after the publication of this policy on the Smart DCC's website.

2 Provision of the GFI Tool

The GFI tool is available to industry parties who are developing products in line with the GBCS for use with the UK's Smart Metering Implementation Program. GFI will enable parties to test their understanding of GBCS standard against their development.

GFI is free to parties but there is a cost to the energy industry. The costs incurred by DCC through the development and maintenance of GFI and recovered by socialising the costs across industry parties. This is done through a Charging Methodology as described in the Smart Meter Communication Licence and Smart Energy Code. Therefore, the GFI tool's distribution must have some restrictions to minimise costs and allow the fair distribution of a limited asset.

The provision of the GFI tool will use the following principles in deciding how many are provided and which organisations are entitled to receive them.

2.1 Provision

Only Parties who can demonstrate they are developing a product or service that will be used in the UK's Smart Meter Implementation Program will be provided the tool. Parties will be asked to complete a request form showing the details below. The request form is shown in Appendix A –

- Company name and address.
- Provide a statement of justification, i.e. the product/service in development.
- Company size (number of employees)

DCC will have the final decision on the provision of the GFI tool

2.2 Volumes

To restrict the overall volumes the DCC will enforce the following rules.

- Any organisation based outside of the UK will be restricted to 2 GFI kits

- A UK based company¹ with less than 20 employees will be restricted to 2 GFI kits
- A UK based company between than 20 - 100 employees will be restricted to 5 GFI kits.
- A UK based company who has more than 100 employees will be restricted to 10 GFI kits.

3 Exceptions

Should any organisation require more than those volumes stated in section 2.2 then a charge will be levied at £250 per GFI kit. If a charge is levied the SLAs stated in section 5 still remain.

4 Updates and Maintenance

DCC will provide maintenance releases when they are made available by the service provider (not scheduled) via the upgrade mechanism detailed in the GFI user manual.

DCC will notify all known users via email when an update is available.

Regulatory releases will follow industry release timescales and contain all the updates and fixes detailed by SECAS. Updates to the GFI tool for regulatory releases will be directed by the DCC.

5 SLAs

DCC will provide the services detail below on a reasonable endeavour basis.

- When a request for a tool comes in DCC will post for delivery within 5 working days subject to the availability of stock² and requirements from other organisations.
- Device issues
 - Issues received in the GFI support mailbox the initial assessment will be within 5 working days
 - Fix will be dependant on the issue seen – no SLA.

¹ UK Based company means there must be a UK registered company list with Companies House.

² Service provider's lead time is three months between development and delivery to DCC

Appendix A – GFI Request Form

GFI Request Form				
Name of Requester		Date of Request		
Company Name		UK Based (Y/N)	Company Number (if UK)	
Size (Employees) Tick the line that applies		Justification of Request		
Less than 20 employees				
Between 20 - 100 employees				
Over 100 employees				
Number of GFI Tools Requested				
Configuration		Volume		
Zigbee Test Certificates				
Zigbee Production Certificates				
Delivery				
Contact Name		Contact Email		
		Contact Telephone		
Address		Additional Information		

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MP138 ‘DCC Service Testing in ETAD’

Annex C

Refinement Consultation responses

About this document

This document contains the full collated responses received to the MP138 Refinement Consultation.

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

Question 1				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	Yes	DCC has addressed our concerns around the costs so we no longer object to this Mod.	Noted.
EdF	Large Supplier	Yes – With caveats	From our understanding of the draft proposals for each of the four items, there appear to be no additional cost implications for SEC Parties, now or in the future. Providing DCC as the Modification proposer can confirm this is the case, then we see no reason why this proposal is should not be approved.	DCC can confirm that there will be no additional costs implications for SEC Parties. The proposed new Explicit Charges will facilitate DCC charging for new/additional costs to the relevant Parties.

Question 2: Will there be any impact on your organisation to implement MP138?

Question 2				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	No	-	
EdF	Large Supplier	No	-	

Question 3: Will your organisation incur any costs in implementing MP138?

Question 3				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	No	DCC has moved all costs (other than those already in place) to be explicit charges.	
EdF	Large Supplier	No	-	

Question 4: Do you believe that MP138 would better facilitate the General SEC Objectives?

Question 4				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	Yes	-	
EdF	Large Supplier	See individual comments against each quoted objective below	<p>1 Facilitate the efficient provision, installation, and operation, as well as interoperability, of Smart Metering Systems at Energy Consumers' premises within Great Britain – EDF response – Only the efficient `operation` of Smart Metering Systems at Energy Consumers' premises due to RF noise lab facility. All other points should already be available via the framework that DCC has operated under for the provision of communication services for several years.</p> <p>2 Enable the Data Communications Company to comply at all times with the General Objectives of the Data Communications Company (as defined in the Data Communications Company Licence), and to efficiently discharge the other obligations imposed upon it by the Data Communications Company Licence. EDF response – Yes. However, although these additions may contribute DCC should already have said capabilities if these changes were not made.</p> <p>3 Facilitate innovation in the design and operation of energy networks to contribute to the delivery of a secure and sustainable supply of energy. EDF response – No. Again, DCC should already have said capabilities without these changes.</p>	<ol style="list-style-type: none"> 1. DCC notes the views of the respondent and agrees that the efficient operation of Smart Metering Systems at Consumers premises if facilitated by the changes proposed for RF Noise Testing. 2. DCC notes that these capabilities are available prior to the modification, however, the proposal provides further clarity around the arrangements of Testing Services. 3. DCC notes the views of the respondent and will update the Proposer's views accordingly.

Question 5: Noting the costs and benefits of this modification, do you believe MP138 should be approved?

Question 5				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	Yes	-	
EdF	Large Supplier	Only if DCC can provide the written assurances mentioned.	As noted above we agree that this should be approved only if there is a clear statement from DCC that there is no intention to levy any additional changes to SEC Parties, now or in the future, in relation to these additional services. This should be made clear in the report and if necessary, within the legal draft changes.	Please see response to question 1. DCC considers that this should be made clear in the Modification Report but does not feel it relevant to be included within the associated draft legal text changes.

Question 6: How long from the point of approval would your organisation need to implement MP138?

Question 6				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	0	There is nothing for us to implement	
EdF	Large Supplier	None	-	

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

Question 7				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	Yes	-	
EdF	Large Supplier	Yes	Although they should already be aware as these services are not new, the changes may enable all parties to be aware of the services and requirements for using them in a standard uniform approach.	Noted.

Question 8: Do you agree that the legal text will deliver MP138?

Question 8				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	Yes	-	
EdF	Large Supplier	See rationale	Whilst we cannot see a reference to specific charges to SEC Parties, we cannot see a definitive statement that SEC Parties that have already paid for set up costs will not be charged for future costs that may be incurred. Examples of such costs are ongoing maintenance or updates to the services mentioned.	Please see response to question 1. The Explicit Charges will be reviewed annually, and all ongoing maintenance will be incorporated into these charges. DCC does not consider that this needs to be included in the legal text of the modification as this will be confirmed in the Modification Report and managed through the Charging Statement review process.

Question 9: Do you believe there will be any impacts on or benefits to consumers if MP138 is implemented?

Question 9				
Respondent	Category	Response	Rationale	DCC Response
OVO	Large Supplier	Yes	There may be benefit to consumers from other parties using these new testing provisions. As there will be explicit charges for them, our customers will not be affected.	Noted.
EdF	Large Supplier	No	In reality apart from the change to the GFI allocations and set up recovery mechanism for RF Noise testing, all of these services are currently offered by DCC and we believe that they could continue without any changes to the SEC.	Noted.

Question 10: The set-up costs have already been recovered from DCC Users. Should the set up costs be recovered through the Explicit Charges to the Device Manufacturers and a rebate provided to DCC Users?

Question 10			
Respondent	Category	Response and rationale	DCC Response
OVO	Large Supplier	Though we believe there is no need to return these costs, we do not believe DCC should put industry in the position of its having invested significant amounts of money without first receiving approval from DCC User or SEC Parties. This is becoming a more frequent problem in recent years, and DCC should consider its processes carefully in future.	Noted.
EdF	Large Supplier	Yes, the set-up costs should be recovered and rebated to those who provided the funding in the first place. Device manufacturers have the ability to recover their costs via commercial contracts in the supply chain as with any other testing they undertake in design, production and test of their commercial offerings.	Noted.

Question 11: Please provide any further comments you may have

Question 11			
Respondent	Category	Comments	DCC Response
OVO	Large Supplier	-	
EdF	Large Supplier	To be clear, our response does provide a caveat that we expect a written confirmation from DCC to the SEC Panel that DCC will not pass any further costs to SEC Parties in relation to any of the items covered by this modification proposal. For clarity terms to the effect 'no intention' is not acceptable. Unless there is full confirmation that no further costs will be passed to SEC Parties, our position would be to 'reject' this modification proposal and any related legal text changes.	DCC will request that the Modification Report is updated to confirm that no additional costs will be passed on to SEC Parties through the Fixed Charges. All maintenance costs will be passed through the proposed Explicit Charges.

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DP159 'Credit Cover Review'

Modification Report

Version 0.3

11 June 2021

Corporate member of
Plain English Campaign
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About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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Contact

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1. Summary

This proposal has been raised by Sasha Townsend from the Data Communications Company (DCC). The DCC and the Smart Energy Code (SEC) Panel have reviewed SEC Section J3 'Credit Cover' and have identified several areas that would benefit from further clarification. There has been some misinterpretation of the current SEC legal text outlining the Credit Cover processes. This has led to increased risk of cost socialisation. The DCC and the Panel propose to update Credit Cover processes to clarify obligations on parties and reduce the opportunity for misinterpretation, as well as to address inefficiencies.

2. Issue

What are the current arrangements?

Credit Cover is an amount which a SEC Party pays to the DCC, to be used if the Party cannot pay its standard monthly payment for DCC charges.

Credit Cover pays for a Party's outstanding debts up to the value of the Credit Cover in place. If a Party does not have Credit Cover and ceases to trade, unpaid DCC charges are usually socialised amongst SEC Parties if they cannot be recovered by Administrators, which negatively impacts the industry.

If a Party does not provide the required Credit Cover, it will enter an Event of Default under the SEC (Section M8.1). This can negatively impact a Party as there are several actions that the SEC Panel can take to help resolve the Default as quickly as possible. This includes notifying other SEC Parties that the Party is in Default, suspension of several rights, and the suspension of core communication services. It is therefore important that a Party complies with its Credit Cover obligation.

Parties that incur DCC Charges are required to put in place a form of Credit Support¹ if their Credit Cover Requirement² is over the Credit Cover Threshold³. The amount of Credit Support each Party is required to provide and the process of managing Credit Cover is currently set out in SEC Section J3.

If a Party must provide Credit Support, it may do so by providing one or more of the following three options as per Section J3.1:

- a Bank Guarantee;
- a Letter of Credit; and/or
- a Cash Deposit.

¹ means one or more of a Bank Guarantee, Cash Deposit and/or Letter of Credit procured by a User pursuant to Section J3 (Credit Cover).

² A Party's Value at Risk minus the Party's Unsecured Credit Limit.

³ means, in respect of each Regulatory Year, £2,000, multiplied by the Consumer Prices Index for the October preceding the start of that Regulatory Year, divided by the Consumer Prices Index for October 2014. The relevant amount will be rounded to the nearest pound.

What is the issue?

Following the review of SEC Section J3 the predominant issues identified are set out in the following sections:

Calculation of Credit Cover Requirement

Currently, SEC Section J3.2 obliges the DCC to calculate each Party's Credit Cover Requirement "from time to time (and at least once a week)". The DCC considers that as Credit Cover is partly calculated using monthly invoices, this means that when calculated weekly, a Party's Credit Cover Requirement would increase over the month and then decrease again upon payment of their invoice. The DCC notes that this method is labour intensive for both the DCC and SEC Parties as this creates the need to transfer funds between the DCC and Parties on a weekly basis, noting the two-day payment terms.

Furthermore, current processes leave the Credit Cover position open to risk as if a Party is struggling to make payment, the situation may result in Credit Cover being returned and then the Party may not be able to replenish it again ahead of being invoiced.

The Proposer of [MP095 'Alignment of SEC Credit Cover'](#) has been made aware of this Draft Proposal and has decided to keep MP095 on hold while Credit Cover processes are reviewed. The MP095 Proposer will be kept up to date as this modification progresses.

Value at Risk

SEC Section J3.3 sets out that the Value at Risk shall be calculated using the sum of any unpaid costs invoiced to the Party by the DCC and any costs that are likely to be incurred before the next invoice is produced. The DCC notes that the charges not yet paid by the Party may include Explicit Charges which may not be regular charges included in a SEC Party's invoice. This may mean that where Parties are invoiced the Explicit Charges for a given service as a one-off one month, their Credit Cover Requirement may increase the following month and then reduce again when they no longer require the relevant services. Again, this results in the need to transfer funds between the DCC and Parties and could be deemed inefficient. The DCC also notes that this may negatively impact smaller Parties' cashflow. This would be because they would request a larger invoice than usual plus the same cash as Credit Cover in a short space of time, when it does not limit the risk of non-payment.

Parent Company Guarantees

The DCC considers that the current requirements surrounding Parent Company Guarantees (PCGs) are ambiguous and may cause confusion. Legal advice from both the DCC and the SEC Lawyer clarified that the correct interpretation is as follows:

- A PCG is not considered a form of Credit Cover.

- When a PCG is provided by a Parent Company, the Party's Credit Cover Requirement can be calculated using the Parent Company's Maximum Credit Value⁴ and its Unsecured Credit Factor.
- Where no PCG has been provided, the Party's Credit Cover Requirement cannot be calculated by the Parent Company's Maximum Credit Value and Unsecured Credit Factor. In these circumstances, the Credit Cover Requirement is calculated based on the Party's own Maximum Credit Value and Unsecured Credit Factor.

This is currently not clear within the SEC.

Views of the SEC Panel

The Panel considers that the use of PCGs in the calculation of SEC Party Credit Cover requirements is not sufficiently robust. This exposes all SEC Parties to potential financial risk in the event of a Party going into Payment Default. Specifically, the Credit Cover calculations allow Parent Company Guarantees to apply to both the Party's Maximum Credit Value (SEC Section J3.3B) and the Party's Unsecured Credit Factor (SEC Section J3.5). This can have the effect of reducing the requirement for Credit Support to zero.

Unsecured Credit Factor

Currently, SEC Section J3.8 sets out that "each Party shall be entitled to choose which of the listed credit assessment companies, and which of the listed products, is used for the purposes of establishing its Credit Assessment Score⁵ and Maximum Credit Value". The DCC considers that this may enable Parties to choose an option that results in a lower Credit Cover Requirement and notes that this limits the DCC's control over the Credit Cover process. The DCC has also noted that this approach poses a risk due to the outcomes of the Credit Assessment Score and Maximum Credit Value being altered to reduce or remove Credit Cover altogether.

Credit Assessment Report

SEC Section J3.9 sets out the requirements for obtaining a Credit Assessment Report. This includes stating that revised Maximum Credit Value and Credit Assessment Scores shall be obtained as often as the Party "reasonably requires and at least once every 12 months". The DCC also considers that this limits the DCC's control over the Credit Cover process and increases the risk of inadequate Credit Cover Requirements. The DCC has also identified that the table in SEC Section J3.8 does not currently list all possible options for Credit Assessment Scores (and therefore Unsecured Credit Factors).

Increase or Decrease in Credit Cover Requirements

SEC Section J3.12 states that additions and reductions in Credit Support can be achieved by amending the terms of existing Credit Support or exchanging Credit Support. The DCC notes that for

⁴ the amount recommended by one of the credit assessment companies identified in Section J3.8 as the maximum amount a creditor should have outstanding to the Party at any one time.

⁵ means, in respect of a Party, a credit assessment score in respect of that Party procured from one of the credit assessment companies named in Section J3.8 (Party's Unsecured Credit Factor).

bank related cover, terms could be amended. However, the DCC questions what the exchanging refers to. This is because shortfall under Bank Guarantee will likely result in a Cash Deposit being issued, due to the two Working Day timeframe referenced in SEC Section J3.10. This may later be amended, and the Cash Deposit will be repaid in accordance with SEC Section J3.11.

SEC Section J3.13 states that where a Bank Guarantee, Letter of Credit or Parent Company Guarantee provided ceases to satisfy the requirements of the definitions then the DCC shall return the relevant document to the Party within five Working Days after a request to do so. The DCC questions whether the requirement is to return the original documentation via post.

Use of Credit Support

SEC Section J3.16 sets out the requirements for drawing on Credit Support if invoices are unpaid. Currently the section states that the DCC can use Credit Support on the Working Day following the serving of a Notification of Payment Failure. The DCC considers that this timeframe could result in too many cash movements between trading accounts.

Letters of Credit and Bank Guarantees

The DCC considers that the current requirement to provide notice to Parties that their Letter of Credit or Bank Guarantee is due to expire in 20 Working Days as set out in SEC Section J3.22, is not long enough for the Party to put a replacement in place.

SEC Party Confidentiality

The Panel considers that the confidentiality provisions within the SEC, in relation to the sharing of SEC Party information, should be further clarified and updated to facilitate discussions and decision-making by SEC Panel. This relates specifically to Event of Default cases, and the calculation of Credit Cover. At present the DCC seeks SEC Party consent before sharing such data with the Panel, which can delay the process or impede the Panel in fulfilling its role.

The Panel believes the confidentiality provisions within SEC Section M4.7 should be updated, to facilitate the more expedient sharing of SEC Party information with SEC Panel.

What is the impact this is having?

SEC Parties and the DCC have highlighted that the high level of complexity surrounding the SEC's Credit Cover processes can lead to confusion, and there have been instances where SEC Parties and the DCC have interpreted certain requirements differently. This has led to scenarios where the incorrect level of Credit Cover has been provided and inefficiencies have become apparent. The DCC and the Panel wish to clarify the Credit Cover process to remove opportunities for misinterpretation that may lead to exposing SEC Parties to a heightened risk of cost socialisation.

There have been two issues recently that have stemmed from these misinterpretations:

- The DCC has previously misinterpreted the SEC and considered that a PCG equated to a Letter of Credit. This resulted in four Parties only having a PCG in place, and not Credit Cover. Of the four Parties, one Party has subsequently failed, and the DCC now needs to reclaim charges from the Parent Company, rather than from the failed Party's Credit Cover. It is yet to be determined if this has been successful.

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- As per the SEC, the DCC has accepted PCGs from businesses outside the UK, and, in the case of one Party, accepted a PCG from an Affiliate, in order for the Party to reduce its Credit Cover requirement. The Panel, however, has stated that acceptance of PCGs from non-UK businesses causes concern, in terms of the Panel's ability to successfully claim on them, as does the Party's ability to switch the PCG to an Affiliate.

Impact on consumers

Misinterpretation of the Credit Cover process can heighten the risk of cost socialisation. If a SEC Party ceases to trade and does not have an adequate level of Credit Cover, the costs will be socialised amongst all other SEC Parties. Ultimately, if a SEC Party must pay socialised cost charges, the funds will be borne by the Consumer.

3. Assessment of the proposal

Observations on the issue

The proposal was presented to the Change Sub-Committee (CSC) in April 2021 for initial comment. CSC members were supportive of the proposal and provided no further comment. The proposal was also presented to the other SEC Sub-Committees. Each SEC Sub-Committee was happy for the proposal to progress and provided no further comments on the issue. No Sub-Committees requested to provide input throughout the proposal's progression.

SECAS presented the proposal to the CSC in May 2021 with the recommendation that the Draft Proposal is converted into a Modification Proposal and that this proceeds to the Refinement Process. The CSC agreed with this approach and provided no further comments.

Further potential inefficiencies identified

During the Development Stage, the Panel and SECAS discussed the obligation in SEC Section J3.16:

Use of Credit Support

J3.16 Where a Party fails to pay the Charges set out in an Invoice addressed to that Party by the Due Date for that Invoice, and where the DCC has issued a notice to that Party pursuant to Section J2.1 (Notification of Payment Failure), the DCC shall (in addition to any other remedies available to it) on the Working Day following service of such notice:

- claim an amount equal to the unpaid Charges plus interest (or, if lower, as much as is available to be claimed) under any Bank Guarantee or Letter of Credit provided on behalf of that Party;*
- remove an amount equal to the unpaid Charges plus interest (or, if lower, as much as is available to be removed) from any Cash Deposit account; or*
- undertake a combination of the above in respect of a total amount equal to the unpaid Charges plus interest (or, if lower, as much as is available to be claimed or removed).*

The Panel and SECAS believe that it may be beneficial for the DCC to have more flexibility regarding when it can draw on Credit Cover when a Party has failed to pay its DCC Charges. This would require lengthening the current same Working Day as set out in Section J3.16.

The main driver behind this is for the DCC to draw on Credit Cover when it deems necessary (when it is clear the defaulting Party will be unable to pay its debt). This will mean that the Party will enter into payment default rather than Credit Cover default, which is deemed beneficial as it will enable the DCC to undertake actions that are otherwise not available when a Party is in Credit Cover default. This is particularly relevant to issuing a Statutory Demand, which is possible when pursuing debt (and not Credit Cover) and threatens legal action if payment is not made within 21 Calendar Days.

Appendix 1: Progression timetable

This Draft Proposal will be taken to the SEC Panel for conversion to a Modification Proposal on 18 June 2021. Once the proposal enters the Refinement Process SECAS will work with the Proposer to develop the solution.

Timetable	
Event/Action	Date
Draft Proposal raised	13 Apr 2021
Presented to CSC for initial comment	27 Apr 2021
Presented to CSC for final comment and recommendations	25 May 2021
Panel converts Draft Proposal to Modification Proposal	18 Jun 2021
SECAS to develop solution with the Proposer	Jun 2021
SECAS to engage with SEC Lawyer to refine the Proposed Solution	Jul 2021
Modification discussed with Working Group	4 Aug 2021
Refinement Consultation	9 Aug – 27 Aug 2021
Modification discussed with Working Group	6 Sep 2021
Modification Report approved by CSC	28 Sep 2021

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
CSC	Change Sub-Committee
DCC	Data Communications Company
PCG	Parent Company Guarantee
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat

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DP160 'Certificate Signing Request forecasting'

Modification Report

Version 0.3

11 June 2021



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About this document

This document is a draft Modification Report. It currently sets out the background, issue, and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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Contact

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1. Summary

This proposal has been raised by Graeme Liggett from the Data Communications Company (DCC).

Smart Energy Code (SEC) Section L 'Smart Metering Key Infrastructure and DCC Key Infrastructure' currently sets out the obligation whereby each Party which is an Authorised Subscriber shall provide the DCC each quarter with a forecast of the number of Certificate Signing Requests (CSRs) it expects to send in the following eight months. The forecasts contain a breakdown of the total number of CSRs for Device Certificates, including the issue of a single Device Certificate and ones that are batched together.

The DCC believes that the obligation on Users to provide these forecasts should be removed. There is sufficient capacity within the Smart Metering Key Infrastructure (SMKI) services to no longer require the CSR forecasting process except in the case when exceptional volumes of CSRs are to be sent in a given period by a SEC party.

2. Issue

What are the current arrangements?

SEC Parties will utilise the SMKI and DCC Key Infrastructure (DCCKI) services (SEC Section L) in order to manage Organisational, Device and Infrastructure Key Infrastructure (IKI) Certificates. The SMKI service provides Certificates used for the means of establishing trust and secured communications between parties and smart metering Devices across the DCC network. The DCCKI service provides SEC Parties and Registration Data Providers with Certificates used to authenticate and secure access to DCC interfaces such as the DCC Gateway Connection, Self-Service Interface (SSI), the Registration Data Interface and the DCC User Interface.

SEC Parties which have completed the relevant SMKI and Repository Entry Process Tests and have access to the SMKI services are known as 'Authorised Subscribers'. SEC Sections L8.7-L8.12 currently set out the obligations for each Authorised Subscriber to the SMKI Services to provide the DCC with quarterly forecasts of the number of CSRs it expects to send in the following eight months.

The DCC will provide a monthly report to each Authorised Subscriber setting out the actual number of CSRs sent against those that were forecast. Furthermore, the DCC must provide a report to the SEC Panel setting out the aggregate number of CSRs by all Authorised Subscribers collectively during the month. This will also be compared with forecasted numbers.

The DCC shall not be considered to be in breach of its obligation to achieve the Target Response Times if, during the month in question, the aggregate Certificate Signing Requests for Device Certificates sent by all Authorised Subscribers exceeds 110% of the last forecast of the expected demand for that month.

What is the issue?

CSR Forecasting is resource-intensive despite its low value to the DCC. This means that despite the effort each User puts in to complete each forecast, the benefit and value of the process is not apparent.

The DCC believes that the obligation on Users to provide these forecasts should be removed, as actual CSR requests are relatively stable and are restricted by the volume of assets a Party can install. The DCC carries enough data for this to be largely predictable. The DCC has also stated that there is significant headroom within the SMKI services to facilitate increases in CSRs being sent.

What is the impact this is having?

If nothing is changed, Service Users will continue to expend resources to submit CSR forecasts despite the value of the forecasts being diminished. The SMKI services carry significant headroom, measured in many months of CSRs, and can replenish within several weeks. Furthermore, there is no cost incurred in maintaining additional headroom.

The time and effort taken to complete a CSR forecast by an Authorised Subscriber can also consume 30 minutes of resource. By removing the obligation to submit CSR forecasts, the Service User will be able to reallocate resources accordingly.

Impact on consumers

The issue has no impact on Consumers.

3. Assessment of the proposal

Observations on the issue

During the Development Stage, DP160 was presented to the Panel Sub-Committees. Each Sub-Committee agreed that the issue is clearly defined and were happy for the proposal to proceed to the Refinement Process. The Operations Group (OPSG) and the Smart Metering Key Infrastructure Policy Management Authority (SMKI PMA) will be consulted upon the Proposed Solution.

Views of the Change Sub-Committee

SECAS presented DP160 to the Change Sub-Committee (CSC) for initial comment in April 2021. CSC members commented that each quarterly forecast takes between 30 minutes to an hour to complete. They felt that there was an issue regarding providing the desired level of accuracy. The reason given for this is that customers can now change Supplier much easier and faster than before and this is difficult to predict or forecast. This will be the case more so when the Faster Switching Programme¹ goes live in 2022 which actively encourages customers to change Supplier.

A CSC member advised that, like [MP116 'Service Request Forecasting'](#), this modification will need to be supported by a DCC guidance document that sets out what is expected of Authorised Subscribers once the obligation to provide the forecasts has been removed. The member advised that this will need to be provided in advance of the modification proceeding to vote. SECAS will ensure that the DCC provides the guidance document to the SEC Working Group for review.

¹ <https://www.ofgem.gov.uk/electricity/retail-market/market-review-and-reform/smarter-markets-programme/switching-programme>

The proposal was taken to the CSC in May 2021 for final comments and recommendation. The CSC reiterated that the DCC guidance document must be reviewed by the Working Group and on this basis, was happy for the proposal to proceed to the Refinement Process.

Appendix 1: Progression timetable

This Draft Proposal will be taken to the SEC Panel for decision on 18 June 2021. Once the proposal enters the Refinement Process SECAS will work with the Proposer to develop the solution.

Timetable	
Event/Action	Date
Draft Proposal raised	19 Apr 2021
Presented to CSC for initial comment	27 Apr 2021
Presented to SEC Sub-Committees for initial comment	May 2021
Presented to CSC for final comment and recommendations	25 May 2021
Panel converts Draft Proposal to Modification Proposal	18 Jun 2021
SECAS to develop solution with the Proposer	Jun – Jul 2021
Modification discussed with Working Group	4 Aug 2021
Modification discussed with Sub-Committees	Aug 2021
Modification discussed with Working Group	1 Sep 2021
Refinement Consultation	6 Sep – 24 Sep 2021
Modification discussed with Working Group	6 Oct 2021
Modification Report approved by CSC	26 Oct 2021

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
CSC	Change Sub-Committee
CSR	Certificate Signing Request
DCC	Data Communications Company
DCCKI	DCC Key Infrastructure
IKI	Infrastructure Key Infrastructure
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMKI	Smart Metering Key Infrastructure
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority

Glossary	
Acronym	Full term
SSI	Self-Service Interface

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DP162

'SEC changes required to deliver MHHS'

Modification Report

Version 0.2

11 June 2021

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About this document

This document is a draft Modification Report. It currently sets out the background, issue, high-level solution requirements and progression timetable for this modification, along with any relevant discussions, views and conclusions. This document will be updated as this modification progresses.

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Contact

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1. Summary

This proposal has been raised by Richard Vernon from the Data Communications Company (DCC).

As the smart metering rollout continues, there will be more and more premises with Electricity Smart Metering Equipment (ESME) installed capable of recording consumption in each half-hour period. Ofgem's Electricity Settlement Reform Significant Code Review (SCR) has concluded that settling all consumers on a half-hourly basis would bring net benefits of up to £4.5bn by 2045¹. It has therefore concluded that Suppliers should be mandated to settle their customers on a half-hourly basis (if that consumer has not opted out). Delivering the full solution for market-wide half-hourly settlement (MHHS) will require changes to the Smart Energy Code (SEC) and to the DCC Systems. Ofgem has requested the DCC raise a SEC modification to progress and deliver these changes.

2. Issue

What are the current arrangements?

Generators and Suppliers trade electricity in the wholesale market for each half-hourly period in the run-up to the period of actual consumption. This is based on Suppliers' forecasts of how much energy its customers will consume. The actual amount of energy generated or consumed is then measured, along with any further actions taken by National Grid in real-time to keep the system balanced (the amount of generation at any given time matches the demand from consumers). Settlement reconciles any differences between the electricity a participant buys or sells, and the actual generation or demand realised. Any surplus or shortfall in a participant's position in each half-hour period is subsequently determined through the settlement process, and this difference is charged accordingly. These arrangements are governed and managed under the Balancing and Settlement Code (BSC).

The largest consumers, such as industrial sites, are already required to be settled on a 'half-hourly' basis, and have the metering already equipped to measure consumption in each half-hour period. Suppliers can also choose to settle consumers half-hourly through Ofgem's elective half-hourly settlement work. However, most smaller businesses and households continue to be settled on a 'non-half-hourly' basis. For these consumers, periodic meter reads are taken, usually at intervals of weeks or months. Profiles of average customer usage are then used to allocate the customer's consumption to the half-hourly periods between the meter reads. It is these estimates that are then used in settlement.

Smart Metering Equipment Technical Specification (SMETS) compliant ESME (both SMETS1 and SMETS2+) can record the amount of energy consumed or exported within every half hour period. This provides an opportunity to improve both the speed and the accuracy of settlement. This can also help to enable new products and services, for example in supporting the use of electric vehicles, heat pumps or making use of smart appliances. These can deliver positive outcomes for consumers through lower bills, reduced environmental impacts, enhanced security of supply and a better quality of service.

¹ Please see Ofgem's [final business case and decision to implement market-wide half-hourly settlement](#) for more details.

What is the issue?

As the smart metering rollout continues, there will be more and more premises with ESME capable of recording consumption in each half-hour period. Ofgem has considered whether the whole electricity market should be settled on a half-hourly basis, and in July 2017 it launched its [Electricity Settlement Reform Significant Code Review](#).

Ofgem's analysis has predicted that settling all consumers on a half-hourly basis would bring net benefits of between £1.6bn and £4.5bn over the period 2021-2045. In April 2021, Ofgem published its [final business case and decision to implement market-wide half-hourly settlement](#), confirming the decision to move forward with MHHS.

During the SCR, Ofgem has developed its target operating model (TOM) for how MHHS should be implemented. Changes to the SEC and to the DCC Systems will be required as part of the full solution. Most of the changes being made to the impacted Codes are being managed by the Code Change and Development Group (CCDG).

However, Ofgem has recognised that the changes required for the SEC and the DCC Systems are technical in nature and therefore should progress under the governance of a SEC modification. High level requirements will initially be defined by Ofgem and then refined via the SEC modification framework. This will allow proper scrutiny of the different options and costs by the SEC Panel, its Sub-Committees, and the wider industry. On 27 April 2021, Ofgem issued a [request to the DCC to raise the SEC modification](#).

What is the impact this is having?

Implementing the full TOM for MHHS will require changes to the SEC and to the DCC Systems. Without these changes, the full MHHS solution cannot be delivered.

Impact on consumers

Ofgem has predicted that settling all consumers on a half-hourly basis would bring net consumer benefits of between £1.6bn and £4.5bn over the period 2021-2045. Ofgem considers that the full benefits will only be realised if all Suppliers are required to settle their consumers on a half-hourly basis².

3. Solution

MHHS TOM – SEC requirements

During the SCR, Ofgem has developed its TOM for how the full MHHS solution should be delivered. The SEC and the DCC Systems changes will need to deliver the requirements set out in the TOM. This modification will cover all the SEC changes required to deliver the MHHS solution, not just those impacting the DCC Systems.

² Domestic consumers can opt out of sharing their import half-hourly data for settlement purposes. In this case, the Supplier would settle these consumers using either their daily or monthly consumption and an appropriate load shape to estimate their half-hourly consumption.

Based on the TOM and following initial discussions with the Technical Architecture and Business Architecture Sub-Committee (TABASC), the solution under the SEC and the DCC Systems is expected to cover:

- The introduction of a new User Role for Parties carrying out the Meter Data Retrieval (MDR) service.
- Defining the relevant Service Requests the new User Role will have access to and the associated Target Response Times (TRTs) and testing scenarios.
- The associated security and data privacy arrangements that will apply to the new User Role.
- The User Entry Process requirements for the new User Role.

The full business requirements, the solution to deliver these, and the assessment of the impacts, costs and lead times to deliver the agreed solution will be developed and assessed as part of the Refinement Process. The Smart Energy Code Administrator and Secretariat (SECAS) and the DCC will work closely with Ofgem and Elexon to ensure the SEC changes meet the requirements of the full MHHS solution.

4. Assessment of the proposal

Observations on the issue

Due to the extensive discussions that had taken place on the issue under the SCR, the Development Stage was kept short. Each relevant Sub-Committee was consulted to provide any initial comments on the modification before it was advanced to the Refinement Process.

Change Sub-Committee

The Change Sub-Committee (CSC) was supportive of progressing the modification to the Refinement Process quickly. A member noted it is highly important that the Refinement Process accounts for the large amount of work that has been done by the CCDG.

One member believed that some inaccurate assumptions have been made under the SCR on how smart metering works. The Working Group will need to be careful that the smart metering arrangements are not adversely impacted in trying to incorporate half-hourly settlement. They felt that MHHS has been primarily looked at from a settlement perspective and has focused mainly on obtaining data from Devices, as opposed to thinking about how Devices operate. This was considered out of scope of the CCDG work so this will require SEC Parties to define this in the end-to-end solution. Another member highlighted previous issues caused where only high-level detail had been provided under a modification and stressed that more detail around the solution will be needed to support Parties.

SECAS acknowledged that whilst it will strive to meet Ofgem's overall timetable, this should not come at the expense of making sure the smart metering arrangements are not compromised. If any major issues or concerns are identified as part of the Refinement Process, SECAS will raise these with Ofgem and Elexon as a priority, to assess how these affect the wider solution and timetable. The DCC also noted it has engaged with its Service Providers and is aware of the issues raised. It is using all possible resources to fully prepare for this change.

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Operations Group

The Operations Group (OPSG) highlighted that the modelling and design assumptions within the DCC's solution will need to account for current performance. The DCC acknowledged that projections and assumptions over capacity will be crucial to avoid repeating past issues.

The OPSG queried at what stage it would see how the solution will operate and elements such as traffic patterns and use of the updated provisions. SECAS noted this should be developed and understood as the Refinement Process progresses. The OPSG also encouraged the DCC to test the solution using live Devices rather than emulators, as it has done with other recent changes, as this will reduce costs. The DCC will determine this when the modification is approved, and expects that a mix of established Devices and emulators for Devices not available at the time of testing will be used.

Technical Architecture and Business Architecture Sub-Committee

The TABASC noted the expected requirement for a new MDR User Role. A member queried what the difference between this and the Supplier User Role was. Another member clarified that the Meter Data Retrieval Agent (MDRA) role was planned to be competitive and so an MDR User may not always be a Supplier.

The TABASC queried how this solution would be implemented in the DCC User Interface Specification (DUIS), for example through new Service Requests, and how it would be identified whether a Service Request had been sent by a Supplier or an MDR User. It also asked whether Suppliers should be able to request this data from ESME every half hour if they wanted. The TABASC requested these questions be examined as part of the modification. The initial business requirements propose that the existing Service Requests are re-used, with no new Service Requests expected. Any limit on the frequency of data retrieval will also be established as the modification progresses.

One member noted that while SMETS meters can record the consumption in each half-hour period, they considered they had not been designed to be half-hourly meters and would always be treated as non-half-hourly. They echoed previous comments that the end-to-end solution needed to look at the impact of MHHS across the wider smart metering arrangements and ensure that the changes do not have a negative impact on these.

Other Sub-Committees

The Security Sub-Committee (SSC) and the Smart Metering Key Infrastructure (SMKI) Policy Management Authority (PMA) had no comments on the Draft Proposal. They both requested to be consulted on the security and privacy parts of the solution.

Requiring the DCC to comply with the MHHS implementation provisions in the BSC

During the Development Stage, Ofgem issued a [consultation seeking to require the DCC to comply with the MHHS implementation provisions within the BSC](#). Sub-Committee members queried how the BSC would place obligations on the DCC and how the DCC would be obliged to comply with other Codes. The TABASC was also concerned how the impacts on the smart metering architecture from any BSC-led change impacting the DCC would be assessed.

BSC Section C12 will set out the high-level governance and co-operation requirements of the MHHS programme for MHHS Participants. The proposed new licence conditions would make the DCC a 'MHHS participant' and require it to comply with this BSC Section. These MHHS programme requirements are high level and are intended to sit alongside established Code governance and will not contain operational or detailed requirements. The content of BSC Section C12 is being consulted on as part of Ofgem's [consultation on the MHHS implementation and governance arrangements](#). These changes will be examined for their potential impact on the SEC arrangements under this modification.

Appendix 1: Progression timetable

This Draft Proposal has been presented to the CSC and relevant Sub-Committees for assessment of the identified problem statement. The Panel will now be asked to convert this to a Modification Proposal and progress it to the Refinement Process.

To facilitate effective progression, SECAS and the DCC have begun developing the business requirements in parallel with the Development Stage discussions. These are being discussed with the DCC's Service Providers, Ofgem and Elexon. These will then be discussed and further developed with the Working Group and the Sub-Committees in July and August 2021 before being issued for Preliminary Assessment.

Ofgem is requesting that all changes for MHHS are in place by 1 April 2024. The November 2023 SEC Release is the last scheduled SEC Systems Release that these changes can be included in to meet this deadline. The DCC's initial assessment of the solution has estimated the total lead time at around 18 months. A final decision on this modification will be required no later than May 2022 to allow this modification to be included in this SEC Release. The timetable below has been developed to meet this decision date and will be kept under review as this modification progresses.

Timetable	
Event/Action	Date
Draft Proposal raised	7 May 2021
Presented to CSC for comment and recommendation	25 May 2021
Problem statement discussed with Sub-Committees	Early Jun 2021
Panel converts Draft Proposal to Modification Proposal	18 Jun 2021
Business requirements developed with DCC, Ofgem and Elexon	Jun 2021
Business requirements discussed with Working Group	7 Jul 2021
Business requirements discussed with Sub-Committees	Early Jul 2021
Business requirements updated for comments	Jul 2021
Updated business requirements agreed with Working Group	4 Aug 2021
Updated business requirements agreed with Sub-Committees	Early Aug 2021
Preliminary Assessment requested	16 Aug 2021
Preliminary Assessment returned	17 Sep 2021
Preliminary Assessment discussed with Working Group	6 Oct 2021
Preliminary Assessment discussed with Sub-Committees	Early Oct 2021

Timetable	
Event/Action	Date
Refinement Consultation	15 Oct 2021 – 5 Nov 2021
Impact Assessment costs approved by Change Board	24 Nov 2021
Impact Assessment requested	25 Nov 2021
Impact Assessment returned	28 Jan 2022
Impact Assessment discussed with Working Group	Feb/Mar 2022 *
Impact Assessment discussed with TABASC	Feb/Mar 2022 *
Modification Report approved by CSC	Mar 2022 *
Modification Report Consultation	Mar 2022 – Apr 2022 *
Change Board Vote	Apr 2022 *
Authority decision (anticipated date)	Late May 2022 *

* Meeting dates for 2022 have not yet been confirmed; more precise dates will be provided towards the end of 2021.

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
BSC	Balancing and Settlement Code
CCDG	Code Change and Development Group
CSC	Change Sub-Committee
DCC	Data Communications Company
ESME	Electricity Smart Metering Equipment
MDR	Meter Data Retrieval
MHHS	market-wide half-hourly settlement
OPSG	Operations Group
SCR	Significant Code Review
SEC	Smart Energy Code
SECAS	Smart Energy Code Administrator and Secretariat
SMETS	Smart Metering Equipment Technical Specification
SMKI PMA	Smart Metering Key Infrastructure Policy Management Authority
SSC	Security Sub-Committee
TABASC	Technical Architecture and Business Architecture Sub-Committee
TOM	target operating model
TRT	Target Response Time