Department for Business, Energy & Industrial Strategy

Department for Business, Energy & Industrial Strategy
1 Victoria Street,
London SW1H 0ET
www.gov.uk/beis

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

29 July 2021

Dear Colleague,

SMART METERING IMPLEMENTATION PROGRAMME: DIRECTION TO DESIGNATE SEC VARIATION TESTING APPROACH DOCUMENTS IN SUPPORT OF DCC COMMUNICATIONS HUBS & NETWORKS AND ECOS PROGRAMMES; AND RE-DESIGNATION OF THE ORGANISATION CERTIFICATE POLICY

SVTAD for CH&N

On 30 April 2021, BEIS issued a direction to the DCC to produce a SEC Variation Testing Approach Document (SVTAD) in relation to the Communications Hub and Network (CH&N) Arrangements.

The DCC issued a draft of the SVTAD for the CH&N Arrangements for consultation on 11 June 2021, which closed on 9 July 2021. The consultation proposed that the document would be incorporated into the SEC on 30 July 2021 or as soon as reasonably practicable within one month thereafter.

The DCC received four responses to the consultation. Three of the respondents were supportive of the proposed SVTAD, providing some points for consideration, whilst the other did not indicate support nor an objection. Points for consideration included matters to do with the detail of the scope of testing and how it will be conducted (which we note will be set out in the SVTAD subsidiary Testing Approach Documents (TADs) and Test Coverage Documents (TCDs)), the process for TAG to review and scrutinise the TADs and TCDs, the extent of DCC's responsibility for device interoperability testing, testing with real devices, and that sufficient notice must be provided should it be considered that mandated User Testing is required. DCC has provided its response to these points, none of which require changes to the SVTAD itself as they are either to do with the process of how DCC will engage on testing or to do with more detailed points that will be considered when preparing the SVTAD subsidiary documents. Other points raised related to aspects of the CH&N Programme that are outside the scope of the SVTAD testing arrangements themselves (for example whether there would be a Production Proving Phase and the approach to Communications Hub deployment and upgrades).

The SVTAD for CH&N submitted to BEIS was published[1] by DCC on 27 July 2021. No material changes have been made to the document, although clarificatory changes have been made following a final document review prior to submission to BEIS.

SVTAD for ECoS

On 20 December 2020, BEIS issued a direction to the DCC to produce a SVTAD for the Enduring Change of Supplier (ECoS) Arrangements.

The DCC issued a draft of the SVTAD for consultation on 14 April 2021, which closed on 14 May 2021. The DCC received four responses to the consultation all of which broadly supported the proposed document.

The SVTAD for ECoS submitted to BEIS was published[2] by DCC on 23 June 2021 along-side a consultation on proposed changes to the Organisation Certificate Policy (SEC Appendix B), where it was explained that following consultation, the DCC made a few minor additional changes to the document prior to sending to BEIS for designation.

Organisation Certificate Policy

On 23 June 2021 BEIS consulted[3] on clarificatory changes to Appendix B of the SEC (the Organisation Certificate Policy) to clarify details of how a particular field in XML signing Certificates should be populated by a User not acting in a Supplier role. The consultation closed on 21 July 2021. BEIS did not receive any responses to this consultation, but subsequently followed up on the proposed changes with a number of interested parties, including TBDG and the organisation that originally highlighted the need for a clarification. We also invited views on a revised (re)designation date for the SVTAD for the ECoS Arrangements and the Organisation Certificate Policy of 28 July (or as soon as reasonably practicable within one month thereafter). Of those who responded to our follow up, all supported the changes to the Organisation Certificate Policy and the revised re-designation date.

Direction

This direction is made for the purposes of the smart meter communication licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the "DCC Licence") and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the "SEC").

Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 30

[1] https://www.smartdcc.co.uk/customer-engagement/conclusions-on-the-testing-approach-svtad-for-dcc-s-comms-hubs-and-networks-programme/

[2] https://www.smartdcc.co.uk/customer-engagement/response-to-dcc-consultation-on-the-sec-variation-testing-approach-document-svtad-for-the-enduring-change-of-supplier-ecos-arrangements/

[3] https://smartenergycodecompany.co.uk/latest-news/beis-consultation-on-clarificatory-changes-to-the-organisation-certificate-policy-ocp-and-publication-of-the-sec-variation-testing-approach-document-svtad-for-the-enduring-change-of-supplier-ecos/

July 2021, the SEC Variation Testing Approach Document for the CH&N Arrangements is hereby designated and incorporated into the SEC as Appendix AQ in the form set out in Annex A to this direction; and the SEC Variation Testing Approach Document for the ECoS Arrangements is hereby designated and incorporated into the SEC as Appendix AR in the form set out in Annex B to this direction.

Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that in consequence of the designation of the SEC Variation Testing Approach Documents for the CH&N Arrangements and the ECoS Arrangements, with effect from 30 July 2021 Section A (Definitions and Interpretation) of the SEC is amended to change the definition of SEC Variation Testing Approach Documents to state “means the SEC Subsidiary Documents set out in Appendix AJ, Appendix AK, Appendix AN, Appendix AQ and Appendix AR”.

Pursuant to Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 30 July 2021, the Organisation Certificate Policy previously re-designated into the SEC as Appendix AB is hereby re-designated for incorporation in the form set out in Annex C to this direction.

For the avoidance of doubt, any re-designation of the Organisation Certificate Policy shall be without prejudice to anything done under the DCC Licence or SEC on or after this document first being designated, or to the continuing effectiveness of anything done under this document prior to its re-designation (which shall have effect as if done under the re-designated document).

This direction is also being notified to the SEC Administrator.

Yours faithfully,

Duncan Stone
Deputy Director & Head of Delivery
Smart Metering Implementation Programme

(An official of the Department for Business, Energy and Industrial Strategy authorised to act on behalf of the Secretary of State).

ANNEXES

Annex A – SEC Variation Testing Approach Document for the CH&N Arrangements Version AQ1.0

[This annex is included as a separate accompanying document.]

Annex B – SEC Variation Testing Approach Document for the ECoS Arrangements Version AR1.0

[This annex is included as a separate accompanying document.]

Annex C – Organisation Certificate Policy Version B4.0

[This annex is included as a separate accompanying document.]