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Paper Reference:	SECP_52_1201_04
Action:	For Decision

Release Management Policy Consultation

1. Purpose

We received seven responses to the Release Management Policy consultation, which closed on 17th December 2017. The full responses are contained in Annex 1 of this paper. Annex 2 contains additional information provided as part of the Utiligroup response.

The purpose of this paper is to provide the Panel with a high-level overview of the responses received and the planned next steps.

2. Key points

We have summarised below the key points raised by respondents under each consultation question. Where possible, we have provided a high-level explanation of how any concerns raised can be resolved.

Q1. Do you agree the Release Management Document covers the required scope set out in the SEC?

Six of the seven respondents agreed that the Release Management Document contained all the required information. However, one Party believed that there was no information on how change is to be prioritised in a Release, and therefore did not completely meet the scope set out in the SEC.

Section 3.1 of the Panel's Release Management Policy sets out how the Panel set a release date for a Modification Proposal, and notes several areas the Panel may consider when doing so. This is the mechanism that the Panel would use to prioritise when modifications are implemented.

However, to make this mechanism clearer, we can expand upon and clarify this section of the policy so it more directly relates to any possible prioritisation.

Q2. Do you agree with the proposed frequency of each Release Type?

All respondents agreed that the frequency of SEC Documentation and SEC System releases (two systems releases and one documentation only release per year) was a sensible approach.

Two respondents did raise concerns over the frequency of DCC maintenance releases. They noted that the amount of potential outage due to unplanned maintenance seemed high, and questioned whether three scheduled maintenance releases a year would be sufficient.

The DCC welcomes the feedback and thanks everyone who provided a response. They are currently looking to clarify all aspects of the Maintenance releases. This includes terminology, frequency, timing and other SEC obligations. An update will be provided at the Panel meeting in February.

Q3. Do you agree with the proposed timing of each Release Type?

Six respondents agreed that the timings of the SEC documentation and systems releases seemed sensible, noting they align with other industry codes. One respondent did note that the industry should ensure that levels of change delivered across all the different codes as part of this release schedule are manageable.

One respondent believed that the SEC releases should not coincide with release dates of other industry codes. They noted that a large amount of change being delivered at the same time could increase the risk of issues occurring.

Two respondents raised concerns over the timings of DCC maintenance releases. They reiterated views on the frequency of such releases, but also highlighted that the suggested dates for the maintenance releases coincided with times of the year when a lot of people are on holiday, which may create resourcing issues.

Q4. Do you have a view on the optimal cut-off date for approving changes to be included in each SEC System Release and each SEC Documentation Release?

All respondents agreed that a cut-off date of six months for a SEC documentation release seemed pragmatic. Views on the cut-off date for the SEC systems release differed. Some respondents believed that 12 months was appropriate, whilst others felt that this could enforce a view that 12-month lead times were acceptable.

All respondents noted the need for flexibility around any a cut-off date, and that a pragmatic approach should not be constrained by hardwired dates.

The Release Management Policy is designed to have that flexibility. The cut-off dates provide Parties with an idea of when they can see a baselined version of a Release Implementation Document, but they should not constrain the Panel in setting appropriate implementation dates. The main driver for implementation dates are the lead times provided by Parties and the DCC.

For example, a modification that impacts systems has a lead time of 20 months. The modification is approved 13 months before the June 2020 release (one month before the 12-month cut-off date). This Modification would not automatically become part of June 2020 release since, despite being approved before the systems cut-off date, the lead time would prohibit its inclusion in this release.

Equally, if the modification had a lead time of only six months and it was approved 11 months before a release (one month *after* the cut-off date), the Panel could elect to include that modification in the release, if it believed it was right to do so. In this case, an updated version of the Release Implementation Plan would be issued.

We would suggest that we clarify the Release Management Policy where we can and provide updated guidance on the change and releases process on the SEC website. In addition, we would also suggest looking at the consequences of moving the cut-off dates from 12 months for a systems release to nine months. As noted above, moving this cut-off date doesn't prohibit the Panel including modifications in any Release. This approach would mitigate the concerns of Parties that 12 months is setting the wrong tone for the efficient delivery of change.

Q5. Do you agree with the proposed contents for the Release Implementation Document to be produced for each SEC Release?

The majority of respondents were comfortable with the content of the Release Implementation Document. Two respondents believed more clarity should be provided on when SEC Subsidiary Documents will be produced, especially the DCC User Interface Specification (DUIS), and when testing windows will be open.

We can add further clarity to the Release Management Policy about the information that will be contained in each Release Implementation Document and, as noted above, we can update our guidance. We can also look at preparing Release Implementation Documents for the changes scheduled to go live in June 2018. This would provide a real-life example of such documents to the industry and would allow us to seek feedback on how they can be improved or published.

Q6. Any other comments

Three main topics have been raised under other comments:

- **DUIS:** There were a number of questions raised about how and when the DUIS will be updated. The DCC will address these comments as part of the updated presented in February.
- **Frequency of Review:** Respondents highlighted the need to keep the policy under review. We would suggest reviewing the policy after each release to see whether it remains fit for purpose or whether amendments are required due to lessons learnt.
- **Transitional Arrangements:** A respondent noted that they would like to see transitional arrangements in place to handle the existing modifications, and any subsequent modifications raised, before Release 2.0 goes live. They also questioned how issues being raised from the Technical Specification Issue Resolution Subgroup (TSIRS) were going to be dealt with.

Currently, two system-impacting modifications have been approved for implementation in June 2018¹. After discussion with the DCC, SECAS is working on the assumption that, due to the implementation of Release 2.0 and SMETS1 as well as general timescales, the earliest any further systems impacting modifications can be implemented is June 2019. SECAS is also intending to have a documentation only release in November 2018. Therefore, we are unsure as to how any transitional arrangements would work between now and September 2018, but we are happy to discuss. The anticipated modifications arising from issues raised at the TSIRS will be progressed through the Modification Process. Any urgency of these changes will be taken into account by the Panel when setting the progression timetable.

3. Next steps

SECAS and the DCC will work together to update the Release Management Documentation based upon the consultation responses and any further feedback from the Panel.

At the February Panel meeting we will present an updated version of the Release Management Documentation alongside our responses to the comments raised in the consultation.

¹ It is noted that, to introduce efficiencies, the modifications approved for June 2018 may be implemented in parallel with Release 2.0 in September 2018.

4. Recommendations

The Panel is requested to:

- **AGREE** the Release Management Documentation is updated to address comments raised by respondents

Adam Lattimore

SECAS

5th January 2018

Annex 1 - Release Management Policy Consultation responses

Q1. Do you agree that the Release Management Document covers the required scope as set out in the SEC?

6 respondents – Yes

1 respondent – No

Party	Response	Rationale
British Gas	Yes	We believe the Release Management Document sufficiently covers the required scope as set out in the SEC. We would expect the Release Management Document to be reviewed on a periodic basis (e.g. annually) to ensure that it remains fit for purposes and can develop as we move further into the mass rollout.
EDF	Yes	We agree that the Release Management Document covers the required scope as set out in the SEC.
E.ON	No	<p>Not entirely; our view is as below:</p> <p>D10.8 (a) assuming that 'matters' refers to release type we believe that this has been covered; albeit a little vague with regard to ad-hoc releases</p> <p>D10.8 (b) we do not believe that prioritisation is covered in either this document or Annex A</p> <p>D10.8 (c) we believe this is covered in Annex A</p> <p>D10.8 (d) we believe this is covered in Annex A</p> <p>H8.10 (a) as above (D10.8 (a))</p> <p>H8.10 (b) we believe a framework has been provided in Annex B to cover this, however we would very much like to see a greater level of detail for this concerning:</p> <ul style="list-style-type: none"> • how views are sourced (i.e. consultation, engagement with specific industry groups etc.); • how benefits are assessed (i.e. assumed, identified via engagement etc.);

		<ul style="list-style-type: none"> what is considered in the calculation for the cost of change delivery and change deferral (i.e. cost for industry, cost for consumers, cost for the DCC's systems etc.); <p>how the risks are assessed (i.e. risks for which Industry Parties, what the risks are assessed against etc.)</p> <p>H8.10 (c) we believe this is covered in Annex B</p> <p>H8.10 (d) we believe this is covered in both 4.2 and Annex B</p>
ENWL	Yes	The Release Management Document contains a high-level overview of the release framework and the scope of what is contained in the SEC Panel Release Management Policy (to cover the implementation of approved Modification Proposals) and the DCC Release Management Policy (to cover the implementation of changes to the DCC Internal System and/or Parse and Correlate Software) which is consistent with the scope set out in the SEC.
Scottish Power	Yes	We agree that the Release Management Document covers the scope set out in the SEC: i.e. the implementation of approved Modification Proposals and changes to the DCC internal systems and/or the Parse and Correlate software.
Utiligroup	Yes	
WPD	Yes	The Release Management Document, although in its entirety is a bit repetitive, does clearly explain all the types of releases, their frequencies and the timescales associated with them.

Q2. Do you agree with the proposed frequency of each Release Type?

5 respondents – Yes

2 respondents – No

Party	Response	Rationale
British Gas	Yes	We have the capability to manage releases in February, June and November. However, we understand the rationale for moving to just 2 SEC System Releases per year with supporting SEC Documentation Releases, scheduled maintenance and Responsive Maintenance throughout the year. As with the comments above, we would expect the timetable to be reviewed on a periodic basis.
EDF	No	<p>While we agree with the proposed frequency of the SEC Releases, we have a number of concerns about the frequency of the DCC Releases, and especially the frequency of DCC Responsive Maintenance Releases.</p> <p>While issues affecting the DCC live systems need to be addressed on a timely basis, any system downtime has a direct and material impact on live smart meters and the business processes associated with them. It is not clear how DCC Responsive Maintenance Releases, which are described as ‘unplanned’, will be managed and how the need for these Releases will be minimised. Our view is that ‘unplanned’ maintenance must be limited to the resolution of issues that have caused the DCC systems to be unavailable (‘system down’), anything else should be planned maintenance with sufficient notice and timing agreed across Users to minimise the impact on customers.</p> <p>While we agree with the proposal for two SEC System Releases each year it is not clear what impact this will have on versions of the DCC User Interface Specification that are supported by DCC. It has previously been stated that DCC will support two versions of the DUIS (the current one and the previous one) – having two releases a year this will require Users to upgrade their systems more frequently than they might have anticipated.</p>
E.ON	No	<p>Our view is as below:</p> <p>SEC Documentation – one to three releases a year is an accepted standard</p> <p>SEC System – two releases a year seems a pragmatic approach to take at this point in time. We would however note that we believe it is necessary to have a transitional Policy to address outstanding Modifications prior to the implementation of this Policy.</p> <p>SEC Ad-Hoc – ad-hoc releases are an accepted standard</p>

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		<p>DCC Scheduled Maintenance – ‘Scheduled Maintenance’ is not a defined term and it is unclear whether this is in addition to Planned Maintenance or simply a terminology issue. We do not however believe that where the latter is so, and would thus highlight that three releases a year is insufficient given that the current proposal to is to implement this Policy following Release 2.0 (Annex B 3.3)*.</p> <p>In addition it is unclear how with only 18 hours outage a year, the level of expected defects will be fixed and deployed successfully. Moreover, given the level of defect resolution expected, there is the risk that due to the nature of the definitions provided within this document, the majority of fixes deployed into live following implementation of the proposed Policy will be ‘Responsive Maintenance’.</p> <p>*We further believe that the implementation date of this Policy ought to be a topic for consultation; our view is that it would be remiss to implement an enduring Policy in the absence of DCC stability and a transitional Policy to attend to outstanding Modifications, issues and defects.</p> <p>DCC Responsive Maintenance – Again a term which is not defined and which we believe is likely to refer to Unplanned Maintenance. We do not find it acceptable in the period between mass-roll and DCC stabilisation, that the majority of outages be Unplanned Maintenance. Where fixes are required and the volume of live consumers is significant, both adequate notice and limitations are required for outages in order that consumer-impact is minimised.</p>
ENWL	Yes (with consideration given to risk)	The proposed dates for scheduled releases set out in the Panel Release Management Policy appear to align with the existing MRASCo (DTC) release calendar. It's unclear if this is coincidence or deliberate policy, but all parties should consider where aligning the Implementation dates in this way creates a risk due to potential resource contention across business and IT systems.
Scottish Power	Yes	We agree the timetable seems reasonable.
Utiligroup	Yes	See attachment.
WPD	Yes	The SEC Releases frequency seems reasonable. The DCC Scheduled Maintenance Schedule appears reasonable; however I do have concerns with the amount of outage time for the DCC when you also consider BCDR testing.

Q3. Do you agree with the proposed timing of each Release Type?

4 respondents – Yes

3 respondents – No

Party	Response	Rationale
British Gas	Yes	Yes. We believe the DCC has taken a sensible and pragmatic approach in determining the timing of each release. Whilst there may always be competing industry change the proposed dates are aligned as much as possible and should allow for Users to manage change appropriately.
EDF	Yes	<p>We agree that for the SEC system releases it makes sense to align the release dates with those used by existing codes such as the BSC and the MRA. This will help parties optimise their delivery schedules and share release testing and development costs across the various changes.</p> <p>What this does mean is that a view needs to be taken across the codes as to the capacity available for further change in a release – if parties are having to deliver significant changes under the other codes then this will need to be accounted for by the SEC (and vice versa) – Parties have a limited capacity for change and changes shouldn't be approved if they can't be delivered.</p> <p>As noted in the response to question 2 we would welcome clarity as to the impact the proposed timing of SEC system releases will have on the DCC User Interface and the versions of that interface available to Users. If changes are implemented in June and November then in theory Parties would have from June to November (5 months) to upgrade to the June version of the interface before the previous version is withdrawn, however they will have from November to June (7 months) to upgrade to the November release before the previous June's release is withdrawn.</p> <p>The impact of these timings on versions of the DUIS and the subsequent impact of this on Parties needs to be understood when approving any releases.</p>

E.ON	No	<p>SEC Releases – The months proposed for these releases are accepted standards</p> <p>DCC Scheduled Maintenance – as above, we do not believe three releases a year to be sufficient. We think it more beneficial to have Planned Maintenance scheduled for each month as the obligations of the SEC allude to (H8.3 and H8.4). This would provide Industry with the structure (i.e. limitation to the amount of time allowed for outages) and the notice (i.e. 20 WDs prior to the month in which the maintenance will occur) required to ensure that their customers experience as little disruption as is possible.</p> <p>DCC Responsive Maintenance – ad-hoc releases are an accepted standard, however we would welcome a greater level of assurance that Unplanned Maintenance will not be utilised to address anything other than ‘emergency’ fixes.</p> <p>New Product Development – ad-hoc releases are an accepted standard</p>
ENWL	No	<p>The proposed dates for DCC scheduled maintenance are the last Thursday in January, April and August. Scheduling releases for April and August are highly likely to coincide with Easter and Summer holidays (both for DCC and User parties). It’s unclear if this is coincidence or deliberate policy but all parties should consider where aligning the Implementation dates in this way creates a risk due to potential resource contention across business and IT systems.</p>
Scottish Power	Yes	<p>We are comfortable with the timetable proposed, along as it is adhered to.</p>
Utiligroup	No	<p>We would prefer dates that do not coincide with the current release dates for other Industry codes / products such as the DTC and IX. As a managed service provider to large numbers of market participants across all codes, any product release requires us to update multiple environments within a short period of time. Whilst we have automated this process as much as possible, running updates to multiple products as well as multiple environments adds a degree of risk that we would prefer to avoid if possible.</p> <p>NB this does depend on whether we are mandated to upgrade our systems / our clients systems simultaneously with the SEC / DCC releases, or whether there is flexibility around this. The Release Management document does not make it clear what flexibility there would be around this, even for releases which are determined as being Mandatory. Assuming there is always a degree of flexibility, i.e. the ability for us to choose the timing of our own upgrade following the SEC/DCC release, then we have no issues with SEC and DCC making their own upgrades on the identified dates.</p> <p>We also assume, but would like confirmation, that the 1 month notice period for DCC Maintenance releases only applies where there is no end-user impact.</p>

WPD	Yes	
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Q4. Do you have a view on the optimal cut-off date for approving changes to be included in each SEC System Release and each SEC Documentation Release?

Party	Response	Rationale
British Gas	Yes	A 12 month cut-off date (measured from Ofgem approval) has always seemed a sensible minimum requirement and would support our own internal change processes. However, there may be times where this can be flexed, upon the necessary agreement from Parties, and be less than 12 months. There also may be change proposals that have a high certainty of being approved where development could start prior to Ofgem approval. In the unlikely scenario where work commenced and the change proposal did not progress (e.g. Ofgem rejection, proposal withdrawn) the cost of any work carried out could still be recovered.
EDF	Yes	<p>We would agree that a 12 month cut-off date for inclusion of changes in a SEC system release (or 6 months for a documentation release) seem sensible as principles, however these should not be inflexible and set in stone. If all Parties, including DCC, are able to agree that a change can and should be delivered within shorter timescales then this should be possible.</p> <p>As is noted in the document some changes might require a longer lead time to implement, so Parties can't wait for the Release Implementation Document to be finalised before they start developing changes. As noted in the response to question 5 it is important that Parties have a view of a release, and especially changes to the technical specifications, as they develop, to ensure that Release dates can be met.</p>
E.ON	Yes	<p>We understand the Policy being consulted upon provides a 12 month cut-off date post approval for implementation for System Releases, and a 6 month cut-off date post approval for Documentation Releases. We do not understand however what the justification for these cut-off periods is.</p> <p>The 17 current Modifications that would constitute a System Release have a mean average of 14 months from the time of their proposal to their approval for implementation. – That is using the date of 15th December as the 'approved for implementation' date, since these are all still within the refinement process. If it then takes a further 12 months from approval to have these Modifications actually implemented then no DCC-impacting Industry change can be made within two years of the identification of its necessity. We do not believe this to be a suitable, enduring change model. We believe that it is not only too inflexible for the Industry requirements of the DCC Service, but that it adversely impacts (or has the potential to) the following SEC Objectives: (a), (b), (c), (d), (e), and (g).</p>

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		<p>We believe that the Impact Assessment (IA) undertaken during the refinement process allows for the design of the solution and we do not believe it should take an additional 12months to build and test said solution. The IA after all highlights testing requirements, and should therefore allow for their planning. We believe that 6 months following approval is sufficient for implementation. We would however note that this is on the premise that this Policy is not implemented following Release 2.0, and that it follows a transitional Policy that attends to the implementation of outstanding Modifications.</p> <p>Where a non-DCC impacting Modification takes less time during the refinement process, 6 months from approval to implementation, especially where DCC Users are impacted, seems appropriate.</p>
ENWL	Yes (for SEC Documentation Releases) No (for SEC System Releases)	<p>The SEC Release Management Document sets out that the cut-off date for SEC System Releases will be set at 12 months prior to the implementation date of the release. Whilst the cut-off date for SEC Documentation Releases will be set at 6 months prior to the release implementation date.</p> <p>We propose both cut off dates are set at 6 months. A 12 month lead can be perceived to be the industry and/or DCC not acting in an efficient manner and stifling change.</p>
Scottish Power	Yes	<p>We broadly agree that cut-off dates 6 and 12 months ahead of document and systems releases, respectively, is satisfactory. However, we also note that more flexibility will be needed with regards to such cut off dates to allow for the ad-hoc scheduling of urgent releases.</p>
Utiligroup	Yes	<p>For SEC Documentation releases, assuming there is no user-system impact then we have no views as to an optimal cut-off date.</p> <p>For SEC System releases this depends on the content of the release and the availability of documentation to confirm any user-system changes required. Where changes to DUIS, for instance, are required, then these need to be published in sufficient time for user-system changes to be impact assessed, planned, developed and tested, particularly if any mandatory testing is required by DCC. On the latter point, that also depends on whether the release itself has a fixed date / period of time within which it must be implemented by us / our clients.</p>
WPD	No	

Q5. Do you agree with the proposed contents for the Release Implementation Document to be produced for each SEC Release?

5 respondents – Yes

2 respondents – No

Party	Response	Rationale
British Gas	Yes	We are happy with the proposed contents.
EDF	No	<p>While we broadly agree with the content of the Release Implementation Document it is not clear from this when revised versions of the relevant parts of the technical specifications defined in the SEC (such as the DCC User Interface Specification) will be made available. The content of the RID refers to the following:</p> <ul style="list-style-type: none"> • Each Modification Proposal approved as part of the SEC Release; • The impacts of each modification on each Party Category and DCC systems; • Other SEC related documentation (such as SECAS Guidance documents, Design Notes etc.) that will need to be amended as part of the implementation of the SEC Release; <p>It is not clear from this when we will see an updated version of the DUIS comprising all of the changes and when this will be finalised. It is also not clear whether a draft version of the new DUIS for each will be maintained and updated as Modification Proposals –providing an up to date view of the specifications as they are developed. It is these documents, rather than the Modification Proposals, that Parties will use as the basis for their design of any release.</p>
E.ON	Yes	
ENWL	Yes	
Scottish Power	Yes	We agree with the contents proposed for the Release Implementation Document, although we would like some clarity regarding how the impacts on Users will be explained and/or quantified.
Utiligroup	No	As above, we need clarity on the date, or date range on which / within which we would be required to upgrade our systems to the new release. And aligned with this, we require information on the start date and availability window of test environments against which we can undertake any optional or mandatory testing.
WPD	Yes	The RID sounds like a clear indication of what is going on and I think that the DCC should refer to this document when conducting Preliminary and Impact Assessments.

Q6. Do you have any further comments on the Release Management Document?

Party	Comment
EDF	While the Release Management Document and the two Release Management policies provide a reasonable framework for implementing changes in the future, it is not yet clear what changes will be approved, what the impact of those will be and whether the Release Management Document is actually fit for purpose to deliver those changes – especially where they also relate to versions of devices such as meters. This will need to be kept under review as Modification Proposals are approved for Releases in 2019 and beyond – and should be able to flex to ensure that changes are delivered in the optimum manner.
E.ON	<p>Scheduled Maintenance (SM) and Responsive Maintenance (RM) are new concepts currently undefined within SEC. It is our belief that Planned Maintenance (PM) and Unplanned Maintenance (UM) are being referred to (respectively), but where that is not the case a greater level of detail is required in either the Release Management Document or the DCC's Release Management Policy. We believe that where these two concepts do not relate to PM or UM absolute clarity is required in terms of how and why they are distinct; how the processes interact and the impacts and consequences thereof; the depiction of all DCC maintenance on the maintenance diagrams demonstrating any level of overlap, and appropriate definitions of Scheduled and Responsive maintenance pertaining to what is involved (i.e. requirements such as those in SEC H8.3 and H8.4). However, if these terms do refer to PM and UM we would request that appropriate SEC terminology, as recognised by the Industry is used in these documents.</p> <p>As noted in our responses to the questions above, we would like to see the transitional arrangements for accommodating the outstanding Modifications, issues and defects before we are keen on agreeing to anything enduring. For example, if this Policy were implemented following Release 2.0 what would happen to the Modification BEIS is raising with SECAS for outstanding issues and defects from the TSIRs group; would Release 3.0 (Enrolment and Adoption) be considered SM/PM or a New Product Development; how would the current Modifications be prioritised in terms of their release, etcetera.</p> <p>It would also be helpful if the implementation date of the transitional and enduring arrangements were consulted upon at the same time so that Industry have complete clarity on the arrangements for everything existing today, and for everything going forward.</p> <p>We would be interested to understand Ofgem's view of this proposal given the level of requirements of the Authority.</p>
Utiligroup	See attachment.

Annex 2 – Utiligroup response to Release Management Consultation

Thank you for the opportunity to respond to this consultation. We have a number of areas that we would like to address, which are explained below. We would be very happy to discuss these with you following your own review.

1. Numbering of releases

We would prefer a simple sequential numbering of all releases, regardless of release type. If necessary, release type could be indicated through use of incrementing of sub-numbers, as per the following example (to follow DCC release 3.0)

Date	Release Type	Release number
Jan 2019	DCC Scheduled Maintenance	3.1.0
Feb 2019	SEC Documentation Release	3.1.1
March 2019	DCC Responsive Maintenance	3.1.1.1
April 2019	DCC Scheduled Maintenance	3.2.0
June 2019	SEC System Release & SEC Documentation Release	4.0.0
August 2019	DCC Scheduled Maintenance Release	4.1.0
September 2019	DCC Responsive Maintenance	4.1.0.1
October 2019	DCC Responsive Maintenance	4.1.0.2
November 2019	SEC System Release & SEC Documentation Release	5.0.0

This provides clarity over the order in which releases have been made available and in which, potentially, they need to be applied by user systems.

2. Support for previous releases

There is nothing in the document to explain how many releases, or of what type, DCC will support. Our current understanding is that DCC will maintain backwards compatibility for up to two releases. Currently, for instance, our understanding is that as we are now on Release 1.4, support exists for release 1.3 but not release 1.2. But in the model outlined in the Release Management Consultation we do not believe the same principle can apply, as different release types have different impacts on the User.

This is very important for us to understand from both a test environment perspective but also in relation to production environments.

Where a release, of any type, does not contain mandatory end-user changes, and in particular mandatory end-user testing requirements, we believe we have flexibility over the timing of our own upgrade processes. In consultation with our clients we might, for instance, choose not to

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upgrade to a particular SEC System Release on the date it becomes available, but may delay this for some time. During that period there is potential for other DCC Scheduled Maintenance releases and SEC Documentation Releases to have taken place, and even potentially a further SEC System Release. Unless there is functionality in the release that is mandatory, other factors may influence the timing of our entry and exit from any test phase, and similarly our upgrade of production environment(s). Our view is that DCC should, as a minimum, apply the backwards compatibility requirement to SEC System Releases, i.e. always providing support for the current and at least one previous SEC System Release version, and thereby any other DCC Scheduled Maintenance releases that have taken place in the interim.

3. Timing of releases

As per our response to question 3 we would prefer different dates for the SEC System Releases, possibly May and September. However, we also believe that Scheduled maintenance should be more evenly spaced out to avoid the potential for Responsive Maintenance, particularly towards the end of the year.

4. Testing of releases

We would like some more information about the RID and the approach to testing, including:

- a. How far prior to the release does the RID get published, and when does it get baselined?
- b. When does TAG see it, how far in advance do they review it? Do TAG get involved in the change process as part of determining what release is appropriate for a particular mod? If not, without knowing what testing is required how can a suitable release be proposed, particularly if there are mods within a release that may have dependent or consequential testing requirements on each other?
- c. Who will determine whether any testing is Mandatory? Does any future mandatory change require separate consultation, or can it just be mandated by TAG / Panel?
- d. For testing phases, will test environments only be available for a fixed period of time, in which case are we forced to test during a specific window (restricting our flexibility over release management)
- e. How will DCC manage access to test environments / allocation? Will testing with real devices be required? Will User entry take precedence over release testing (even if it is mandated testing)?
- a. Finally, we are slightly concerned re the timing of the releases being made available to test. With the volume of potential releases, fitting in test windows (assuming some testing is required) may be a challenge for DCC.

5. Change management

- a. What is the change management approach if things change between the 12 month cut off and go live? What is the capacity for emergency modifications that require a shorter lead time?

6. Other questions

- a. In DCC Annex B 3.10 it mentions taking views of Parties into account. We would like to understand the process via which this will be done.
- b. Bearing in mind the potential backlog of change requiring to be released via this process, how will releases be managed to ensure even distribution of change within the different scheduled releases?