

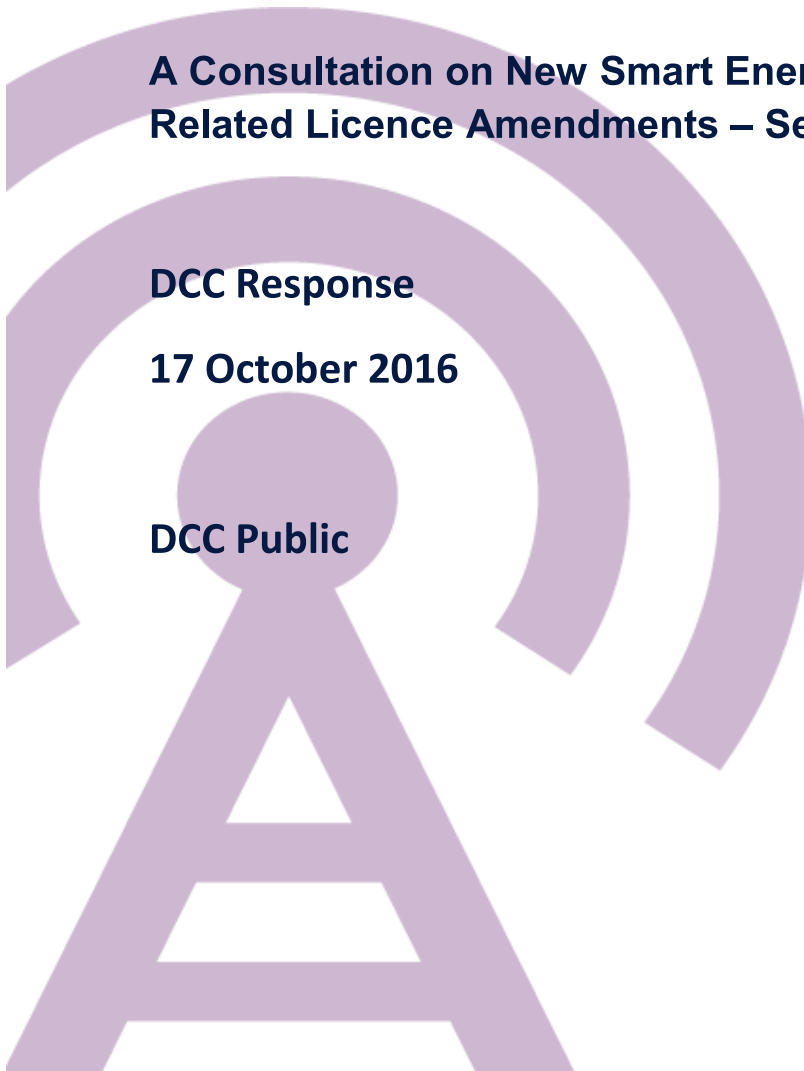
## **Smart Metering Implementation Programme**

### **A Consultation on New Smart Energy Code Content and Related Licence Amendments – September 2016**

**DCC Response**

**17 October 2016**

**DCC Public**



## 1 Executive Summary

1. Smart DCC Ltd, known as the Data and Communications Company or DCC, welcomes the opportunity to respond to 'a Consultation on New Smart Energy Code Content and Related Licence Amendments' released on 22nd September 2016.
2. DCC holds the licence, granted by the Department of Energy and Climate Change (DECC), to establish and manage the data and communications network to connect smart meters to the business systems of energy suppliers, network operators and other authorised users of the network.
3. DCC broadly welcomes the proposals in the consultation and broadly supports the proposed changes to the Smart Energy Code (SEC), subject to specific areas for further consideration, which are set out in the sections which follow. DCC has noted some observations in response to questions 17 and 18 in particular to ensure the proposed changes are as clear and as unambiguous as possible.
4. DCC focuses its response on the consultation questions which invite a response on new legal drafting in the SEC. We have not provided a response to the questions which focus on changes to the Supply Licence Conditions.

## 2 DCC response

### 2.1 Testing required to implement changes to the SEC

**Question 6: Do you agree with the proposal and associated legal drafting to introduce additional requirements to provide for appropriate testing when the Secretary of State proposes to introduce amendments to the SEC? Please provide a rationale for your views.**

DCC broadly supports the proposal to introduce requirements in the SEC to provide for appropriate testing when the Secretary of State (SofS) proposes to introduce amendments to the SEC. DCC's support is subject to the following considerations:

In respect of the proposed amendment in Section X11.2, where DCC is required to analyse and report on changes required to the DCC systems and the likely costs:

- Where a proposed variation impacts one or more of DCC's Service Providers (SPs), DCC will be required to request an impact assessment (preliminary assessment and full impact assessment) from its Service Providers. Such Service Provider assessments are subject to contractual timescales and internal DCC governance procedures. These activities must be completed in order for DCC to return an accurate assessment of the impacts of changes being introduced. DCC would ask that any request for an impact assessment is made in consultation with DCC, to ensure that the timescales required by the DCC to deliver a robust and accurate assessment are taken into account. DCC look forward to working with BEIS to identify the appropriate process for this.
- DCC requires clear, unambiguous requirements to assess the impacts of change. DCC notes that where requirements for a variation change, DCC will need to review and potentially revise any impact assessment previously submitted for the variation in question. DCC considers that this should be reflected in the relevant provisions under the SEC.

In respect to the production and submission of a draft SEC Variation Testing Approach Document (SVTAD):

- DCC notes that the proposed drafting of X11.4 requires that a SVTAD is developed by the DCC as per a timetable and process directed by the SofS. We would ask that the timetable and process is developed in consultation with DCC. This will help DCC to ensure that it has sufficient time to put in place the processes, special governance and resource required for the production of an SVTAD.
- In relation to the information required for each SVTAD, listed in X11.5:
  - *(c) the testing environments to be used* - DCC considers that this should not restrict the testing approach. For example, should DCC determine that, during the testing process, an additional environment should be used (for example, for a UIT 'dry run').
  - *(i) the process for making amendments to the document, which shall include amendments directed by the Secretary of State* - DCC considers that BEIS should specify clearly what is expected with regards to the governance of changes to an SVTAD. A single governance process that applies to all SVTAD

- changes is efficient and ensures consistency across the implementation of changes.
- (j) *the process for resolving disputes under the document* - it is unclear as to whether this requirement refers to disputes arising from the consultation on the document or disputes arising from DCC's implementation of the testing approach in accordance with the SVTAD. DCC requests that this is outlined clearly.

**Question 7: Do you agree with the proposal and associated legal drafting (amendments to Section D) to clarify when and how testing requirements should be considered, for SEC Modification Proposals? Please provide a rationale for your views.**

DCC broadly supports BEIS's proposals to incorporate explicit references to the development of testing requirements and Testing Services throughout the Modification Process. DCC's approach to testing of SEC Modifications will largely be defined on a Release by Release basis. Each Release Specification will set out the approach to testing for that Release – any DCC impact assessment for a Modification Proposal provided in accordance with D6.9 will set out a testing approach for the relevant SEC Modification that is consistent with, and may reference, the relevant Release testing approach.

There is possibly a typographical error in D1.7: superfluous 'and' after the semi-colon.

## **2.2 Enduring Registration Data Provider Entry Process Testing**

**Question 8: Do you agree with the proposal and associated legal drafting to provide enduring RDP Entry Process Tests? Please provide a rationale for your views.**

**Question 9: Do you think that it is appropriate that new Electricity Distribution Licensee or Gas Transportation Licensee holders, who opt to use the services of an existing RDP (which has already successfully completed RDP Entry Process Tests) be permitted to use this testing service? Please provide a rationale for your views.**

DCC broadly supports the proposal to provide enduring RDP Entry Process Testing. DCC's support is subject to the considerations below:

- SEC E4.3 – DCC considers that the proposed drafting describes two slightly different scenarios in which RDP Entry Process Tests can be undertaken, and may benefit from being set out as two separate clauses. The second sentence could benefit from being made clearer. For the avoidance of doubt the SEC at this point should restate that testing undertaken by RDPs in SIT pursuant to Section T2 qualifies as RDP Entry Process Tests.
- Any changes to the ETAD to provide an enduring RDP Entry Process Test Service should also set out the different scenarios in which the tests can be undertaken. As noted in the consultation the testing requirements for a new RDP will be different to a case where a new DNO/iDNO/GT planning to use an existing RDP wishes to use a test facility.
- There are significant lead times in terms of developing the processes and systems required to provide an enduring RDP Entry Process Testing service. DCC looks forward to working with BEIS on considering these timings if the proposed changes are designated.

## **2.3 Changes to the Enduring Testing Approach Document (ETAD)**

**Question 10: Do you agree with the proposal and associated legal drafting to provide DCC with the ability to require a Testing Participant to remove its Devices from a DCC test laboratory, in accordance with the requirements set out in the ETAD? Please provide a rationale for your views.**

DCC supports the proposal to set out new provisions in Section H14.10A in accordance with the provisions in the ETAD enabling DCC to require a Testing Participant to remove its Devices from a DCC test laboratory. DCC supports the inclusion of a dispute resolution procedure in H14.10A.

## **2.4 Provision of variant Communications Hubs for testing**

**Question 11: Do you agree with the proposal and associated legal drafting to clarify the requirements around Test Communications Hubs? Please provide a rationale for your views.**

DCC supports the proposed SEC changes for the provision of variant Communications Hubs for testing.

## **3.1 Changes to Section N to support SMETS1 Enrolment and Adoption by the DCC**

**Question 12: Do you agree with the proposed changes and legal drafting in relation to Section N? Please provide any rationale.**

DCC broadly supports the inclusion of new provisions in Section N of the SEC relating to further information and new analysis to support the Enrolment of SMETS1 Meters. DCC shares the view that the development of a detailed assessment of the feasibility of enrolling SMETS1 Meters into DCC is a complex activity, especially given the varied commercial and contractual arrangements that exist in the current SMETS1 marketplace, and that it is possible that DCC will require further information following the production of the Initial Enrolment and Adoption Feasibility Report (IEPFR). DCC welcomes the BEIS's recognition that there may be restrictions that prevent information relating to current SMETS1 services being shared by energy suppliers, and is committed to working with BEIS and the IEPFR stakeholders moving forward to ensure that as many meters as possible are included within the scope of the Initial Enrolment Project.

## **3.3 Privacy Requirements**

**Question 14: Do you have any comments on the proposed changes to Section H and Section I? Please provide a rationale for your views.**

DCC supports the proposed changes to Section H and Section I.

## **3.4 Making certain transitional variations enduring**

**Question 15: Do you agree with the proposals to make certain transitional variations described in Chapter 3.4 enduring? Please provide a rationale for your views.**

DCC broadly supports the proposal to make the transitional variations discussed in Chapter 3.4 enduring. However, in relation to modifying the definition of User Systems, DCC suggests that the proposal to make this transitional variation enduring should be reviewed by the SEC Security Sub-Committee to ensure the security implications are fully assessed before the change is made.

### **3.5 Definition of Registration Data Provider Systems**

**Question 16: Do you agree with the proposal to revise the RDP Systems definition and the associated legal drafting? If not, please provide a rationale.**

DCC supports the proposed changes to the definition of Registration Data Provider Systems.

### **3.6 Changes to the Supply Licence Conditions, the DCC Licence and the SEC to accommodate multiple versions of Technical Specifications and multiple versions of DUIS**

**Question 17: Do you agree with our proposals for how multiple Technical Specifications and GBCS should be managed within the Code and do you have any comments on the proposed changes to supply licence conditions, the DCC licence and the SEC in order to give effect to them?**

DCC broadly supports the proposals for managing different versions of Technical Specifications and GBCS within the SEC. DCC's support is subject to the following considerations:

- DCC would ask that more information is provided regarding how the Compatibility Matrix will be populated over time. As the versions of Technical Specifications and the associated GBCS versions change over time the Compatibility Matrix will become more complex. In addition, we consider that the matrix should be extended to include DUIS versions, which will support the latest version of GBCS. This will help to ensure there is an end to end view with regards to messaging.
- It is noted that in the case of a Communications Hub, the changes would be required to be made retrospectively as a matter of course (paragraph 100) – DCC would ask for clarity on why the need to apply retrospective change to a Communications Hub is considered to be different (/ more common) in comparison to applying retrospective changes to other devices.
- The proposed approach to managing different versions of Technical Specifications and the interface with GBCS, CPA and DUIS versions may have an impact on the DCC Systems. An assessment will need to be undertaken to identify the full impacts. Furthermore, it is not clear from the proposals whether there are/ will be any obligations on DCC to support the management of the proposed approach. DCC looks forward to working with BEIS to consider these issues further.
- DCC suggests that the GBCS is defined as a Technical Specification under the SEC. Treating GBCS as a Technical Specification (alongside SMETS, CHTS) can help to some extent in

reducing the complexity that arises from maintaining different versions of design documents under the SEC.

- DCC would ask that provisions for the treatment of stock (i.e. timescales for installation of Devices) which comply with an older version of the Technical Specification are clearly set out in the regulation. DCC look forward to working with BEIS on this.
- Consequential impacts on CPL design – in the current design a single device will be associated to a single GBCS and Technical Specification version. The proposed approach notes that for a period of time a device can comply with multiple versions of a Technical Specification. The subsequent impacts on the CPL will need to be fully assessed. DCC looks forward to working with BEIS on this.
- It is not clear from the proposals whether firmware updates to a device will trigger a change to the version of a Technical Specification or GBCS. DCC request that this is clarified.

**Question 18: Do you agree with our proposed approach to facilitating multiple versions of DUIS (and associated versions of the Message Mapping Catalogue and Parse and Correlate software)?**

DCC supports the SEC provisions that recognise the possibility that more than one version of the DUIS may exist at a time, and that there will be corresponding versions of the Message Mapping Catalogue (MMC) and the Parse and Correlate (P&C) software. DCC's support is subject to the considerations below:

- There are currently multiple version of the DUIS and DCC plans to continue to maintain (unless overtime this is not technically or economically feasible) the different versions as it is considered beneficial to Users – it gives Users the ability to upgrade to align with new DCC systems over a flexible timetable. Furthermore, given there is more than one version of the DUIS (and associated Interface Specifications, in particular the MMC), DCC considers that it may also be helpful to Users if an approach for managing the different versions (and the associated Interface Specifications) is developed. DCC are happy to work with BEIS to consider this proposal further.
- For clarification we would like to note that new versions of MMC and an associated version of the P&C software may be introduced without the need for an updated DUIS, if for instance there was a change to the GBCS in relation to message response definitions. In this scenario changes to the DUIS are not necessary.
- DCC has some specific comments in regards to the drafting of Section A3.34:
  - The drafting may benefit from specifying a maximum number of versions permitted at a time.
  - There can be more than one MMC and P&C version associated to a DUIS version. The latest version is always the one recommended by DCC to be used as the current version, however older versions are still available to support Users upgrade paths. This complexity reinforces DCC's earlier suggestion that an approach for managing different versions of DUIS and associated Interface Specifications should be considered by BEIS.
  - DCC suggests the drafting is amended to reflect that each Service Request will refer to a XML schema version and not a version of DUIS. The DUIS makes a reference to the related SML schema version and this is how the link is made.

- The requirement to provide a separate version of the P&C software is in relation to each MMC version and not DUIS.

### **3.7 Minor Miscellaneous Changes**

**Question 19: Do you agree with the proposals to make the changes set out in the Minor Miscellaneous Changes chapter and do you agree with the associated legal drafting? Please provide a rationale for your review.**

DCC supports the proposed amendments.