DRAFT Direction Letter

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 Section X6 (Transitional Variations) of the SEC, the Secretary of State hereby directs that Section X (Transition) shall be varied with effect from [18 April 2016] by the addition of the provisions set out in the **Annex** to this direction. The date from which such variation shall cease to apply is the date on which Section X ceases to apply in accordance with Section X1.5 (Ending of the Application of this Section X).

Pursuant to Section X3.7 (Provisions to be Effective Subject to Variations), the Secretary of State hereby directs that the variation to Section H14.31 (Device and User System Tests) made on 24 April 2015 shall be cancelled with effect from immediately before the commencement of End-to-End Testing.

This direction is also being notified to the SEC Administrator and an updated version of the SEC to reflect these changes will be available on the SECAS website in due course.

Annex

X9 INTERIM DEVICE AND USER SYSTEM TESTING

Interim Device Testing

X9.1 The DCC shall provide a testing service (referred to in this Section X9 as "GFI Testing") to enable eligible persons to test the interoperability of Devices (other than those comprising Communications Hubs) with the DCC Systems and with the Communications Hubs to be 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. The DCC shall provide GFI Testing with effect from as soon as reasonably practicable after this Section X9.1 takes effect, and (in any event) from the commencement of End-to-End Testing.

X9.2 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 X9.2);
- (b) the references in Section X9.1 to "Communications Hubs", "DCC Systems" and "Devices" shall be interpreted as including reference to prototypes or simulations of those things (and GFI Testing shall not include communication via the SM WAN, or a simulation of the SM WAN);
- (c) Section H14 (Testing Services) shall apply in respect of GFI Testing as if GFI Testing was a Testing Service, and the DCC and each person undertaking GFI Testing shall comply with Sections H14 in respect of GFI Testing as if GFI Testing was a Testing Service (provided that none of the following shall apply: Sections H14.3, H14.4, H14.9, H14.10 and H14.11);
- (d) persons undertaking GFI Testing must each comply with such 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
- (e) the Testing Issue process in Section H14.37 to H14.45 (General: Testing Issue Resolution Process) shall not apply to GFI Testing, but the 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.

Pre-UEPT Testing

- X9.3 The DCC shall provide a testing service (referred to in this Section X9 as "**Pre-UEPT Testing**") that enables Parties to test their capability (and that of their Systems) to undertake the following activities over a DCC Gateway Connection:
 - (a) the sending of (at least) the following Service Requests (which are identified by reference to the numbering used in the Common Test Scenarios Document):
 - (i) 4.1.1;
 - (ii) 5.1, 5.2 and 5.3;
 - (iii) 6.2.7, 6.11, 6.15.1, 6.15.2, 6.17, 6.20.1, 6.21 and 6.23;
 - (iv) 8.1.1, 8.2, 8.3, 8.4, 8.5, 8.6, 8.7.1, 8.7.2, 8.8.1, 8.8.2, 8.9, 8.11, 8.12.1, 8.12.2, 8.13, 8.14.1, 8.14.2, 8.14.3 and 8.14.4; and
 - (v) 11.1, 11.2, 11.3, 12.1 and 12.2;
 - (b) the sending of one or more Signed Pre-Commands; and
 - (c) the receipt of Pre-Commands and Service Responses in respect of (at least) the Service Requests set out in paragraph (a) above (in the case of Pre-Commands, only to the extent those Service Requests are designed to generate Pre-Commands).
- X9.4 The following shall apply in respect of Pre-UEPT Testing:
 - (a) the references in Section X9.3 to "Service Requests", "Signed Pre-

Commands", "Pre-Commands", "Service Responses", "Device Alerts" and "DCC Alerts" shall be interpreted as including simulations of those things, which simulations may:

- (i) include standardised or sample Data; and
- (ii) omit Certificates, GBCS Payloads, Digital Signatures or Message Authentication Codes that would otherwise be required;
- (b) Section H14 (Testing Services) shall apply in respect of Pre-UEPT Testing as if Pre-UEPT Testing was a Testing Service, and the DCC and each Party undertaking Pre-UEPT Testing shall comply with Sections H14 in respect of Pre-UEPT Testing as if Pre-UEPT Testing was a Testing Service (provided that none of the following shall apply: Sections H14.3, H14.4, H14.9, H14.10 and H14.11);
- (c) persons undertaking Pre-UEPT Testing must each comply with such 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 process in Section H14.37 to H14.45 (General: Testing Issue Resolution Process) shall not apply to Pre-UEPT Testing, but the DCC must take reasonable steps to provide support and assistance to a Party undertaking Pre-UEPT Testing in order to assist that Party in resolving Testing Issues encountered when undertaking Pre-UEPT Testing.

Interaction with Device and User Systems Tests

- X9.5 The DCC shall not provide (and no Party shall be entitled to undertake) any testing of Devices under Section H14.31(a) (Device and User System Tests) during the period (if any) between commencement of GFI Testing and commencement of End-to-End Testing.
- X9.6 The DCC shall not provide (and no Party shall be entitled to undertake) any testing of Systems under Section H14.31(b) (Device and User System Tests) during the period

between commencement of Pre-UEPT Testing and commencement of End-to-End Testing.

X9.7 The DCC shall continue to make the tests under this Section X9 available following the commencement of End-to-End Testing.