



Communications Hubs & Networks Conclusions on its consultation on changes to the CH&N SVTAD

DCC Conclusions for the Communications Hubs & Networks
program on proposed changes to the CH&N SVTAD

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Author: consultations@smartdcc.co.uk

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1. Introduction and Context

1. The Data Communications Company (DCC) is Britain's digital energy spine, supporting the transformation of the energy system. DCC is licensed by the Government and regulated by the energy regulator Ofgem to connect smart meters in homes and small businesses across Great Britain to a single secure, digital network. DCC supports the roll-out of second-generation (SMETS2) smart meters, as well as the migration of existing first-generation (SMETS1) meters onto its network.
2. The Communications Hubs and Networks Programme (CH&N) is a DCC initiative geared towards defining and delivering future-proof Communications Hubs & Networks in the Central and South regions with an efficient supply chain and a targeted longevity of at least 15 years. To ensure this longevity of smart functionality DCC is developing a solution to allow for the introduction of new Communications Hubs (CHs) which use the 4G network. To achieve this, DCC established the CH&N Programme to assess development and implementation options for a 4G solution.

1.1. Background

3. On 30 April 2021, Pursuant to Section X11.4 (SEC Variation Testing Approach Document) of the Smart Energy Code (SEC), the Secretary of State directed the DCC to develop a draft SEC Variation Testing Approach Document (SVTAD) in respect of those variations to the SEC that are being considered to enable the introduction of the 4G CH&N Arrangements – the 'CH&N SVTAD'.
4. On 11 June 2021, DCC consulted on proposed content for the CH&N SVTAD which closed on 9 July 2021. 1 DCC concluded on the consultation and submitted the proposed draft to the Secretary of State on 23 July 2021. 2 On 30 July 2021, the first version of the CH&N SVTAD was designated into the SEC as Appendix AQ – SEC Variation Testing Approach Document for the CH&N Arrangements.
5. Section 3 of the CH&N SVTAD sets out the circumstances under which the CH&N SVTAD can be modified. DCC must first consult with Parties and other relevant persons and then present a summary of the consultation responses to the Secretary to State. Section 3.1(B) provides that any such modification must include consultation with Parties and other relevant persons, the Testing Advisory Group (TAG), the Authority and the Secretary of State. DCC has consulted pursuant to that section.
6. Since the consultation and conclusion on the CH&N SVTAD, DCC has been further developing its programme delivery plan for the 4G service. As part of this process, the proposed plan for delivery has changed, meaning changes are required to the test approach for CH&N. On 22 August 2023 the Department sent out a communication to the members of the Implementation Managers Forum (IMF) in which it was explained that DCC would be introducing a multi release approach to releases. The change is due to the early release of DUIS changes to support 4G comms hubs and an early release of functionality limited to supporting the manufacture and shipping of comms hubs for IPV.
7. DCC considers it prudent to update the CH&N SVTAD to reflect the multiple release approach which will require multiple SIT phases.
8. On 25 September 2023, DCC consulted on proposed changes to the CH&N SVTAD, in accordance with the requirements of Section 3.1(b), to accommodate these proposed changes. This document summarises the consultation responses received and the DCC response. It will be submitted to the Secretary of State along with the updated CH&N SVTAD.

2. Consultation Questions & Responses

2.1. Questions

The consultation presented the consultation questions as set out in Table 1.

CH&N SVTAD Q1	Do you agree with DCC's proposals to amend the CH&N SVTAD? Do you have any detailed comments on the proposed legal drafting? Please provide a rationale for your views.
CH&N Q2	Do you agree with the proposed amendment of the CH&N SVTAD by the DCC on 15 December 2023 (or, if necessary, as soon as reasonably practicable within one month thereafter) using the draft notification at Attachment 1?

Table 1

2.2. Responses

9. DCC received a written response from five respondents.
10. DCC provided all written responses to the Secretary of State.

3. Analysis of Responses

11. DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed every response.
12. DCC has structured the analysis of responses by question. Thus, this section presents DCC's analysis by question in several separate subsections; with each structured as:
 - an overview of the responses on the topic;
 - where appropriate a DCC response; and
 - areas where DCC disagrees with the view presented by respondents and this has not been resolved, as per the regulatory requirements.

3.1. Question 1

13. DCC sought views on proposed changes and legal drafting of the SVTAD: **“Do you agree with DCC's proposals to amend the CH&N SVTAD? Do you have any detailed comments on the proposed legal drafting? Please provide a rationale for your views.”**

Respondent View

14. DCC received five responses to this question.
15. Three of the respondents agreed with DCC's proposals.
16. One of the respondents questioned whether there should be a requirement to have the review/approval of a SEC Panel Subcommittee to ensure that there was agreement with industry before any submission to the Secretary of State for Clause 8.1 in respect of interoperability issues found in the user testing environments.
17. One of the respondents noted that DCC is using emulators in the testing for CH&N. The party raised a concern that the use of emulators had caused issues in previous releases and accordingly

that the use of emulators in the testing for CH&N could result in unnecessary delays or issues. The respondent noted that the multiphase release would result in real devices being available in due course. The respondent requested that the DSM is re-evaluated prior to any release testing phase to increase the chance of using actual devices from a wider range of manufacturers as this would provide increased confidence that the testing results are valid in the real-world environment. The respondent was of the view that Clauses 2.4 and 4.3.3 should require DCC to specify whether emulators were used as this would provide TAG greater insight as to the suitability of the testing that was undertaken.

18. A respondent was of the view that the drafting of Clauses 2.8 and 2.9 were circular and that the drafting should be revisited.
19. A respondent indicated that Clauses 4.3.3 and 4.3.4 referred to a non-existent Clause 4.3.5.

DCC Response

20. DCC notes the view that TAG should have a role to play during the User testing phase related to interoperability testing issues. The specific requirement is that it is referred to the Secretary of State, though in addition DCC would discuss any such issue with TAG. Where DCC thinks the CH is compliant with CHTS and refers the matter to the Secretary of State, the Secretary of State is able to canvas stakeholder views on DCC's view on compliance if it considers it necessary/appropriate in arriving at its determination.
21. DCC notes the concern raised on its reliance on emulators to test aspects of the Comms Hubs where tests would be destructive to devices, or for some technical testing constraint where tests cannot be run with devices. It should be noted that the vast majority of tests in PIT and SIT will be run against real devices. DCC is of the view that there are a limited number of issues that arise as a result of testing with emulators and that these have been significantly reduced from issues seen during earlier releases. The DCC Devices team presents regular updates to TAG regarding the use of emulator in testing and TAG has not noted any particular concerns in this regard.
22. DCC specifies in the Test Approach Document that the intention is to use real devices where available and the Test Completion Report will state where emulators are used. The use of emulators is agreed with TAG through the approval of the Test Coverage Documents and DCC is therefore of the view that a specific obligation on DCC to specify the use of emulators is not required. The 4G CH&N Device Selection Methodology (DSM) is a separate document, the applicable version of which DCC will reference in the Test Approach Document for the relevant release. DCC is currently of the view that there will be no need to update it for the CH&N programme as DCC is not aware of any significant changes in the installed base, but will review as appropriate.
23. DCC is using real devices for both PIT (including CIT) which is currently planned to be completed in January 2024 and SIT which is planned to be completed in June 2024 in respect of the December 2024 go-live release. The Devices used for testing in both phases of testing were selected by using the DSM agreed with TAG. The DUIS changes for the CH&N programme which is being delivered along with the June 2024 SEC Release and the Device Manager early release to support manufacturing certificates for IPV devices will be delivered prior to the CH&N Core Release in December 2024 which will also be tested using real devices. The Test Approach Document produced for the early release will reference the appropriate DSM document.
24. The principles of Clauses 2.8 and 2.9 are the same, however Clause 2.8 covers the Test Approach Document and Clause 2.9 the test coverage document. DCC is therefore of the view that the drafting is not circular. DCC agrees that there is no Clause 4.3.5 and has amended Clauses 4.3.3 and 4.3.4 accordingly.

Areas of Unresolved Disagreement

25. None

3.2. Question 2

26. DCC sought views on the proposed designation of the CH&N SVTAD asking: *“Do you agree with the proposed amendment of the CH&N SVTAD by the DCC on 15 December 2023 (or, if necessary, as soon as reasonably practicable within one month thereafter) using the draft notification at Attachment 1?”*

Respondent View

27. DCC received four responses to this question.
28. All respondents agreed with the proposed designation date.

DCC Response

29. DCC notes the respondents’ support for the proposed re-designation date and DCC therefore concludes it is appropriate to re-designate the CH&N SVTAD on 15 December 2023 (or within one month thereafter).

Areas of Unresolved Disagreement

30. None

4. Summary of Drafting Changes

31. As a result of consultation responses and to clarify the content of the drafting DCC has the following changes to the CH&N SVTAD in addition to those proposed in the consultation:
- Amended the definition of the Order Management System (OMS) in table 1.1 to clarify that returns are not within scope of the OMS.
 - Amended the definition of Pre-Integration Test Phase (PIT) in table 1.1 to clarify that PIT may also include a Component Integration Test Stage.
 - Added a new requirement to clause 4.1.1 to state that the DCC shall include in the Testing Approach Document whether devices are to be used in PIT and/or SIT for a CH&N Release and if so, the applicable DSM.
 - Amended clause 4.2.1 to clarify that the Test Coverage Document will specify the list of Devices pursuant to the applicable DSM.
 - Amended 4.3 in respect to where the DCC does not need to prepare a new CH&N DSM.
 - Resolved any incorrect references to clauses.

5. Conclusions

32. DCC is of the opinion that it has had appropriate engagement and consultation with industry on the changes that have been proposed to the CH&N SVTAD in this consultation. As the responses to the consultation and engagement in industry were supportive of the proposed changes, DCC will submit the proposed changes to the Department for Energy Security and Net Zero (‘the Department’) along with the consultation responses.
33. DCC intends to amend the CH&N SVTAD with the changes proposed in this consultation given the responses received on 8 January 2024 (or within one month thereafter).

34. DCC has, where necessary, addressed the comments that have been received from industry. DCC does not believe that the views expressed result in fundamental amendments to the CH&N SVTAD and, as such, further consultation is neither necessary nor appropriate.
35. The updated SVTAD is in line with the overall testing design for CH&N.
36. It is DCC's view that it has met its SEC obligations.
37. DCC considers that:
 - The updated CH&N SVTAD is defined to a sufficient level of detail for re-designation into the SEC and is materially complete, and the content is technically accurate;
 - There has been appropriate consultation on the proposed changes; and
 - The proposed changes align with the technical requirements for the testing and introduction of 4G Comms Hubs.
38. In summary, DCC considers that the revised CH&N SVTAD is fit for purpose.

6. Next Steps

39. DCC will submit these conclusions to the Secretary of State and will publish its findings on the DCC Website and notify SEC Parties.
40. DCC considers that, having followed the process in Clause 3.1 of the CH&N SVTAD, it is appropriate to amend the CH&N SVTAD.
41. Subject to the Secretary of State not directing otherwise, DCC plans to issue a notice to modify the CH&N SVTAD on 8 January 2024.
42. DCC will notify the SEC Administrator and an updated version of the CH&N SVTAD to reflect these changes will be available on the SEC website in due course.

7. Attachments

Attachment 1: Appendix AQ – SEC Variation Testing Approach Document for the CH&N Arrangements (Clean)

Attachment 2: Appendix AQ – SEC Variation Testing Approach Document for the CH&N Arrangements (Tracked Changes)