



# Consultation

## Regulatory Changes for the Communications Hub and Network Arrangements

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# 1. Background and Context

The Communications Hubs and Networks Programme (CH&N) is a Data Communications Company (DCC) initiative geared towards defining and delivering future-proof Communications Hubs & Networks with an efficient supply chain and a targeted longevity of at least 15 years. Maintaining Smart functionality over the longer term will require the introduction of new Communications Hubs (CHs) which use the newer 4G network. DCC has stood-up a CH&N Programme to implement this.

The Programme will introduce new technology and new service providers, which may mean changes to the arrangements in place for things like the forecasting and ordering of CHs, as well as changes to installation and service management. DCC needs to identify and articulate any regulatory changes which correspond with these changed arrangements.

We are doing this in stages, firstly by setting out our expectations of the scope of changes that are needed on an enduring basis to support the provision of a 4G service and seeking views on these. Alongside this we will be working with industry to test our proposals for the transitional arrangements that need to support the move to the enduring use of the 4G service. Finally, we will set out the 'red-line' changes that we propose to make to the Smart Energy Code (SEC) (both for transition and for enduring) and ask BEIS to use their powers to deliver these changes. We describe this further in Section 3.2 below.

On 23 November 2022 DCC issued a consultation seeking customers' and stakeholders' views on its revised plan and timeline for the delivery of the CH&N Programme. As part of this plan, we have included 3 important milestones which underpin the transitional and enduring regulatory changes that will be required for the programme. These are:

- **By 31 March 2023 – Conclusions on scope of enduring regulatory changes for the programme** – the latest date by which DCC will issue a conclusions document on the scope of regulatory changes required to deliver the CH&N programme (that conclusions document being in response to this consultation);
- **By 30 June 2023 – Conclusions of engagement on 4G Transition** – the latest date by which DCC will issue a conclusions document on proposals for how to manage transition from 2G/3G CHs to mass supply of 4G CHs (that conclusions document being in response to a series of industry engagements being undertaken by DCC); and
- **By 31 October – Conclusions on enduring and transitional legal text regulatory changes for the programme** – Latest date by which DCC will issue a conclusions document (following a written consultation document) on tracked changes it proposes are made to the SEC to reflect the enduring and transitional requirements for the 4G Communications Hubs & Networks Programme.

This document is the consultation that precedes the first bullet point above. Our conclusions on this consultation will form the first bullet point, which we are planning to publish by end March 2023.

On 27 January 2023, DCC consulted on proposed changes to the SEC to support the financing arrangements that DCC is implementing for the CH&N Programme. This consultation was brought forward in order to enable changes, if approved by BEIS, to be incorporated into the SEC in time for them to be used to support the financing arrangements for the Design, Build and Test arrangements for the Programme. The consultation is available on the DCC website here: [Changes to the Smart Energy Code to support 4G communications hubs and networks financing arrangements | Smart DCC](#)

## 2. Scope of this consultation

The scope of this consultation covers the regulatory change that will be needed to support the programme on an enduring basis. These are changes that will be required to support the ongoing, business-as-usual activity for the installation, maintenance and service provision for new 4G CHs, that will be provided alongside an ongoing communications service provision for DCC's current 2G/3G CHs. Transitional considerations are being managed through a series of customer workshops taking place during Q1 and Q2 2023. It is possible that the conclusion of DCC's procurement of OMS and logistics capabilities for the 4G service, which are still ongoing, may give rise to additional changes that need to be made to the SEC. These will, as a minimum, be shared with stakeholders as red-line tracked changes for comment prior to their incorporation into the SEC.

The scope of the CH&N Programme is limited to DCC's Central and South Regions (with the North Region continuing to be supported by CHs which use radio technology as opposed to cellular telecoms). Within this scope, the proposed regulatory change within this document can be broadly split out into the following areas:

- Arrangements in relation to the introduction of NE 4G DBCHs within the Central and South (C&S) Regions; and
- Arrangements in relation to the introduction of a 4G Wide Area Network (WAN) within the C&S Regions.

DCC has considered all the relevant parts of its regulatory framework and related documents as it has assessed the changes within the scope of this consultation. These include:

- The main body sections of the SEC;
- Subsidiary Documents within the SEC;
- Lower-level documents in the SEC (i.e. those which are referred to in the SEC but not subject to SEC Modification governance);
- Any supporting DCC or SECAS managed documents; and
- The DCC Licence.

### **Timings for incorporating changes into the regulatory framework**

Whilst DCC plans to have concluded its engagement on tracked changes to the regulatory framework by 31 October 2023, it will not be necessary to immediately incorporate these changes into the SEC. We consider that there are three key dependencies on regulatory text, as follows:

1. finalising any text that contains requirements which will be subject to any testing under the programme, before that testing is complete;
2. implementing changes to text for any all provisions which will apply to support IPV; and
3. implementing changes to support mass supply of 4G CHs

These dependencies will result in different changes to regulation needing to be in place at different times. DCC intends to set out the detail on when these changes will take effect in the red-line consultation which will conclude by end October 2023.

## Transitional changes

The CH&N Programme will require a period of transition between the current regulatory arrangements relating to CHs, to a period where only 4G CHs are available for installation. This transitional period will require transitional arrangements to the regulatory framework covering, amongst other things, governance of the start of mass production of new 4G CHs and, if required, any rules for managing concurrent volumes of 2G and 4G CHs. This transitional activity is the subject of dedicated stakeholder engagement activity being undertaken during Q1 and Q2 2023.<sup>1</sup>

DCC is undertaking this stakeholder engagement activity in lieu of a formal, written consultation. DCC sees benefit in a more iterative approach to developing its approach, working in close collaboration with stakeholders and specifically energy suppliers. Whilst not issuing a formal written consultation, outputs of this engagement will feed into a final set of written conclusions on transition in June 2023, and this will feed into the final consultation DCC undertakes in Q3 2023 on the 'red-line' changes to the regulatory framework that are needed for both transitional and enduring matters.

## Engagement and extent of our analysis

In addition to seeking stakeholder views via publication of this consultation on the DCC website and notification of its publication to DCC stakeholders (which include SEC Parties, Energy UK, Ofgem, BEIS and SECAS), the consultation will be shared with SEC Panel for comment on any proposed changes to the SEC during the consultation window.

DCC has assessed the full breadth of the regulatory framework relating to Smart Metering (i.e. both the Smart DCC Licence and the Smart Energy Code). Whilst the focus of this review has been on aspects of these documents that are relevant to Communication Hubs and the WAN, we have undertaken what we consider to be an exhaustive assessment. To provide respondents with a targeted and more efficient means to feed-back we have added our analysis of where we have decided that no changes to documents, or sections of documents, are required. This is set out in Section 10 for transparency and comment.

**The closing date for this consultation is 15 March 2023.**

<sup>1</sup> Stakeholders can learn more about DCC's engagement programme by contacting us at [customerengagement@smartdcc.co.uk](mailto:customerengagement@smartdcc.co.uk)

### 3. Approach to Regulatory Change Delivery

In this section we explain our approach to delivering regulatory change. Consistent with the approach taken on other recent major programmes, the scope of future regulatory change required to accommodate 4G Communication Hubs and a 4G Wide Area Network (WAN) will be managed via two separate consultation processes:

1. In general, any proposed amendments to the DCC Licence and the main body of the SEC will be consulted on by BEIS; and
2. Any proposed amendments to the SEC Subsidiary Documents (SSDs) will be co-ordinated through DCC-led consultations.

DCC expects that changes to the main body of the SEC will be enacted by the Secretary of State using powers conferred under section 88 of the Energy Act 2008, with changes to SEC Subsidiary Documents being delivered following Direction from BEIS using powers under Condition 22 of the DCC Licence and Section X of the SEC.

Where changes to supporting documentation are needed, DCC will be following the change governance process prescribed for each on a case-by-case basis. If changes are needed to documents governed by SECAS, DCC will recommend the changes and suggested timetable for their implementation.

#### 3.1. Changes currently out for consultation

On 8 December 2022, BEIS consulted on changes to the SEC that would introduce a new Section F13 into the code, which would give effect to a new SEC Subsidiary Document (SSD), the Network Evolution Transition and Migration Approach Document (NETMAD), which would support the transition to the enduring supply of 4G CHs and the provision of a 4G WAN. We expect this consultation to conclude shortly. Should the SEC changes be implemented, the new Section F13 will be added to the SEC, which includes an obligation for DCC to develop and then consult on the NETMAD.

On 27 January 2023, DCC issued a consultation on red-line changes to the SEC that we consider necessary to provide the requisite financing arrangements to support the CH&N programme. These changes, if supported, are required to be delivered into the SEC earlier by end June 2023 to enable financing of the Design, Build and Testing phases of the programme plan, which are now underway. They also set out arrangements for enduring financing of 4G CHs. This consultation, which DCC is undertaking on behalf of BEIS, includes not only DCC's proposed approach, but also the SEC changes which will give effect to this approach.

Concurrently with this consultation, DCC is consulting on its position regarding the size of 4G CHs. DCC is required to consult under Section F4.12 of the SEC on the physical dimensions of Communications Hubs with Home Area Network (HAN) or Wider Area Network (WAN) Variants that have not previously been made available. This consultation, whilst not impacting the SEC directly, is relevant to stakeholders and we are including it here for completeness.

#### 3.2. Process for delivering Regulatory Change

There are a number of inputs which will inform the changes that are required to the regulatory framework to support the CH&N Programme. These include:

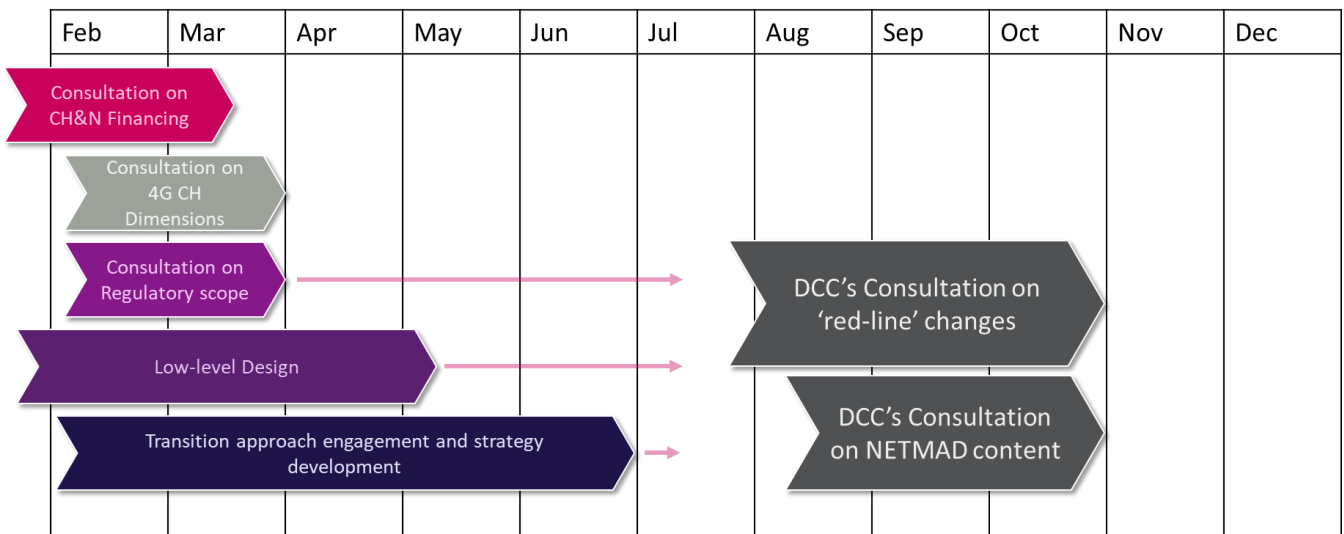
- The low-level design of the final CH&N solution, which is planned to conclude in May 2023;
- The conclusion of DCC's engagement on 2G/3G to 4G transition and which will shape not only the transitional changes required during early programme implementation (e.g. Initial Pallet

Validation), but also requirements which may endure for some time in the SEC (the level, if any, of enduring 2G/3G stock made available to installers). This is set to conclude at the end of June 2023; and

- Responses to this scope document which sets out DCC’s initial view of where changes are needed to support CH&N delivery.

These will then feed into consultations on the actual proposed legal changes to the SEC which will be implemented in two different ways.

- The ‘red-line’ SEC changes consultation process which will set out enduring change to the SEC to support CH&N; and
- The introduction of the NETMAD (the Network Evolution Transition and Migration Approach Document) which will cover transitional requirements for the programme.



DCC will use outputs from the **Consultation on regulatory scope**, **Low-level design** & the conclusions of its Transition engagement to feed into its consultation on 'red-line', tracked changes on the SEC, and the contents of the NETMAD.

## 4. Scope of Regulatory Changes for CH&N

This section sets out DCC's view of where enduring regulatory changes may be required for CH&N. The following artifacts have been reviewed as part of this scoping exercise:

1. The Smart Energy Code (main body and subsidiary documents);
2. DCC/SECAS Documents; and
3. The Smart Meter Communication Licence (DCC Licence)

A high-level summary of the artifacts that DCC considers to be impacted by CH&N and will require updates is included below in Table 1. We have also identified a number of documents that DCC considers may be impacted by CH&N and these are included below in Table 2.

For completeness, we have also included those sections currently out for consultation which relate to the changes required for introduction of the NETMAD, and CH&N Financing Arrangements (described in Section 3.1 above)

**Table 1: Impacted Documents**

Impacted Documents	Impacted Content
SEC Section A 'Definitions and Interpretation'	Potential consequential changes will be needed throughout Section A, including definitions of the SM WAN.
SEC Section F 'Smart Metering System Requirements'	The introduction of a new Section F13 to introduce the NETMAD into the SEC
SEC Appendix H 'CH Handover Support Materials'	<p>Appendices H and I contain the bulk of CH related information and it is expected that a full review of both of these SSDs will need to take place once more detail on the final solution is known. A preliminary review has taken place and a list of impact areas can be found in Section 6.1.</p> <p>An example of a probable change is to remove references to the 2G/3G Special Installation Mesh Communications Hub included in Appendix H..</p>
SEC Appendix I 'CH Installation and Maintenance Support Materials'	As with Appendix H, a full review of this SSD will take place once more information on the final solution is known but it is highly likely that changes will be required, and these have been included in Section 6.2 of this Consultation.
SEC Appendix AD 'DCC User Interface Specification'	DCC have identified changes to Service Requests related to providing information required for the SM WAN Coverage Database. Detail on this can be found in Section 6.4.
Guide for Testing Participants	Information related to ordering test CHs and remote test lab services will need to be added to reflect the change to 4G CSP and changes to SP offerings.
Intimate Communications Hub Interface Specification (ICHIS)	<p>The ICHIS will require updates to include new frequency bands for the new CH. The Appendices of the ICHIS will also need to be updated with the details for the new Communications Hub Antennae Structure (CHAS) (4G CH) unit, the rationale for the CHAS selection, the new antenna placement diagram for the new 4G CH and the noise limits for the two new frequency bands.</p> <p>More detail on these changes can be found in Section 7.1</p>



Communications Hub Supporting Information (CHSI)	The CHSI is expected to require alignment to the new 4G solution in areas such as the labelling and ASN format section which currently refers to WAN Variant CHs. A full review will take place once more detail on the final solution is known. More detail on these changes can be found in Section 7.2.
Communications Hubs Order Policy (CHOP)	The CHOP will need to be updated to include new definitions for the 4G CH, and existing definitions for Single Band Communications Hub (SBCH) and Dual Band Communications Hub (DBCH) will also need to be changed. The details behind these proposed changes have been included within Section 7.3.
Statement of Service Exemptions (produced pursuant to DCC Licence)	Updates to include additional Service Exemption Categories for the two 4G WAN Service Providers, set out in Section 8 of this document.

**Table 2: Potentially Impacted Documents**

Potentially Impacted Documents	Impacted Content
SEC Section A 'Definitions and Interpretation'	There may be an impact to the charging and CH related definitions depending on the outcome of the consultation on CH&N Finance changes.
SEC Section H 'DCC Services'	Changes to the SSI to accommodate the introduction of a 4G WAN and 4G CHs and the coverage checker will require updates, and the presentation of information to SEC Parties might change. This may have an impact on SEC Section H 'DCC Services'.  Additionally, there may be changes to SEC Section H to accommodate the potential Service Provider Performance Measurement differences between the 4G WAN and 4G CHs Service Providers from the existing Service Providers.
SEC Section J 'Charges'	There may be a requirement for further amendments to be made to SEC Section J and K (beyond those already proposed in our consultation on changes to support CH&N Financing) to reflect amended charging arrangements.
SEC Section K 'Charging Methodology'	There may be a requirement to amend charging related definitions in SEC Section A and where the definitions are referenced throughout the SEC.
SEC Section M 'General'	We have included SEC Section M as an area of the SEC that may be impacted (further to the changes we have set out in our consultation on CH&N CH Financing).
Enduring Testing Approach Document (ETAD)	There could be minor amendments to the ETAD to accommodate 4G CHs and the 4G WAN.

## 5. Smart Energy Code – Main Section Changes

There are a number of probable changes to Main Body SEC Sections which we have identified. At this stage, we have a high level of confidence that changes will be required for the following:

- SEC Section A ‘Definitions and Interpretation’
- SEC Section F ‘Smart Metering System Requirements’

Additionally, DCC considers that there may be changes required to the following SEC Sections, which will be confirmed during Q2 2023. These are:

- SEC Section H ‘DCC Services’
- SEC Section J ‘Charges’
- SEC Section K ‘Charging Methodology’
- SEC Section M ‘General’

In this Section we summarise the changes that we anticipate will need to take place, and might need to take place, in the SEC Main Body documents.

### 5.1. Section A ‘Definitions and Interpretation’

#### Overview of Regulation

Section A ‘Definitions and Interpretation’ of the SEC sets out the meaning of defined terms used throughout the Code. Section A also sets out the rules around how the content of the Code should be interpreted for the purpose of the SEC. A review of CH and WAN related definitions has taken place and the following definitions have been identified that may require amendments.

#### Proposed Regulatory Impact

##### Communications Hub Auxiliary Equipment

The definition of Communications Hub Auxiliary Equipment is currently in the SEC as:

“means any additional, replacement or spare equipment or packaging (not forming part of a Communications Hub) that may be required by a Supplier Party in relation to the installation, maintenance or return of a Communications Hub, as listed by the DCC on the CH Ordering System from time to time”.

DCC’s 4G CH solution is not expected to require auxiliary equipment (like additional aerials) and so this definition is likely to require amendment. This may also be impacted by DCC’s conclusions on transition arrangements, and the enduring availability of 2G/3G auxiliary equipment.

##### Region

The SEC currently defines ‘Region’ as:

“means each of the regions of Great Britain that are subject to different DCC Service Provider Contracts, and the region into which a premises (or future potential premises) falls shall be:

(a) identified insofar as reasonably practicable in a document published by the DCC (or the Panel on behalf of the DCC) from time to time; or

(b) where a premises (or future potential premises) is not so identified, confirmed by the DCC on application of any Party or in response to the resolution of an Incident regarding the fact that a premises (or future potential premises) is not so identified, and once a premises has been identified by the DCC as being in a particular region, the DCC shall not identify that premises as being in a different region (unless agreed by the Supplier Party or Supplier Parties Registered for the MPAN and/or MPRN at the premises and the Network Party or Network Parties for the network(s) to which the premises is, or is intended to be, connected).”

The CH&N programme will be introducing 4G coverage within the existing C&S Regions. 4G services will not be provided by the same entity that provides 2G/3G services today within a defined Region. As a result of this, operational processes defined within the SEC may need to be different and dependent upon the Service Provider delivering these services, for example the returns of Communication Hubs or the installation process itself. DCC considers that it will be necessary to be able to separate and easily identify the providers of these services within a Region. It is therefore probable that the definition of ‘Region’ within the SEC be amended.

## **5.2. Section F ‘Smart Metering System Requirements’**

### **Overview of Regulation**

Section F sets out the requirements for smart metering systems, and Sections F4 to F10 set out the obligations specific to the provision of CHs. Given the significant and scale of change in this part of the SEC, DCC has conducted a detailed review of Section F to consider whether changes would need to be made to support the CH&N Programme, for example, how SEC Parties forecast and order the new 4G CHs and whether updates need to be made to the CH Order Management System (OMS) described the SEC.

Our review has also considered whether changes are required to show how the new 4G CHs will be delivered and accepted, removed and returned and whether there will need to be Network Enhancement Plans for the 4G WAN. Section F also stipulates that further information may be set out in the CH Handover Support Materials, which have also been considered in detail in Section 6.

### **Section F procedural or technical content**

Some of the sub-sections in Section F of the SEC include procedural and technical content. This is content which was added relatively early to the SEC, before the practice of adding this level of detail into Subsidiary Documents was fully established.

It is DCC’s view that to stay consistent with the way the SEC is currently updated and maintained, we should add any new procedural and technical content that relates specifically to the 4G CH Service in SSDs, as opposed to the main body of the SEC.

This could include 4G-specific detail such as procedures for 4G specific forecasting and ordering requirements). Whilst this ensures consistency with the way the SEC is currently maintained, it would mean that some technical and procedural content relating to 2G/3G CHs (currently included in Section F5) would sit in a different location to comparable requirements for 4G CHs. DCC will consider if there are opportunities to move content from Section F main body into a new SSD separately in the future, as this is something that falls outside the scope of the CH&N programme.

### **Special Installation Mesh Communications Hubs**

There are three different WAN variants today, Cellular, Cellular + Mesh, and Special Installation Mesh. It is to be confirmed whether these WAN Variants will be replicated for 4G or if a further variant type will be

required for 4G as a new coverage solution. If the latter, changes may need to be made within Section F of the SEC, or in an associated SSD to include the 4G variant types.

DCC suggests SEC Section F6.19 'Special Installation Mesh Communications Hubs' and all other references to Special Installation Communication Hubs be moved into a SEC SSD.

SEC Sections F7.4A 'Special Installation Mesh Communications Hubs' – F7.10 'Ownership of and Responsibility for Communications Hub Auxiliary Equipment' refer to solution specific technology and DCC would recommend moving this content into a SEC SSD.

### **CH Orders and deliveries**

It may be necessary to amend content in Sections F5.7 and F5.8 so that it aligns with the detailed service design for 4G CHs. The obligations covering CH delivery in Section F6 may also need to be changed to reflect the agreed approach with new Service Providers responsible for CH logistics.

### **Test CHs**

Finally, it may be necessary to amend provisions relating to Test CHs so that the text in the SEC reflects the capabilities of the new Test CHs that will be made available for the 4G WAN.

## **Other changes to Section F**

### **References to Indexation for CH Type Faults and CH Batch Faults**

We expect that the content in Section F9 of the SEC, which refers to how the costs are calculated for compensation for different types of CH faults will need to be amended. Currently Section F9.18 of the SEC sets out that compensation for CH faults are calculated using a formula which includes a reference to the Consumer Prices Index for 2013. This aligns with the point at which the contracts were arranged for 2G/3G CHs. The contracts signed with the new 4G CH Service Provider are not linked to 2013 Consumer Prices Index of 2013 and we plan to amend the SEC so that compensation in relation to 4G CH Faults is calculated in line with the corresponding contracts for 4G CHs.

## **5.3. Section H 'DCC Services'**

### **Overview of Regulation**

Section H covers the provisions relating to services provided by DCC to DCC Users, as well as the obligations on SEC Parties to become DCC Users so they can use DCC Services. A detailed review of Section H has taken place paying particular attention to potential changes that might be required in Section H8 'Service Management, Self-Service Interface and Service Desk', Section H9 'Incident Management', Section H12 'Intimate Communications Hub Interface Specification', Section H13 'Performance Standards and Reporting' and Section H14 'Testing Services'.

### **Proposed Regulatory Impact**

#### **Section H8 - Self-Service Interface (SSI)**

It is possible that there will need to be changes to the SSI to accommodate the introduction of a 4G WAN and 4G CHs, in that the coverage checker will require updates and the presentation of information to SEC Parties might change.

### Section H13 - Performance Standards and Reporting

DCC anticipates that there may need to be changes made to SEC H13 'Performance Standards and Reporting' to accommodate any potential Service Provider Performance Measurement differences between the 4G WAN and 4G CHs Service Provider from the existing Service Providers.

To be clear, DCC does not expect any 4G service offering to be lower in terms of performance relating to the current performance standards set out in the SEC. However, there may be differences in reporting approach or how performance is met, which will need to be updated in Section H.

### Sections H9, H12 & H14

Our analysis of these sections suggests that changes to the main body of the SEC are unlikely, but that the linked subsidiary documents (the Incident Management Policy, the ICHIS and the Enduring Test Approach Document (ETAD)) will need to be updated. These changes are described in Section 6.

## 5.4. Section J 'Charges' and Section K 'Charging Methodology'

### Overview of Regulation

Changes to Sections J and K are dependent on changes to other areas of the SEC, for example should the definition of 'Communications Hub Auxiliary Equipment' change, then this may have an impact on the provisions in Sections J and K where charges relating to this equipment are described and calculated. The detailed changes should be known once changes elsewhere in the SEC have been determined, and we will include these changes in the Q3 2023 red-line consultation for the programme. We note that changes are currently out for consultation relating to financing arrangements for 4G CHs and for 4G Design, Build and Test programme activity.

### Proposed Regulatory Impact

Our analysis of Section J indicates that further changes are unlikely in this section.

For Section K, we consider changes to be more likely. These include in Section K7.5, which sets out different explicit charges that DCC can apply for certain services. There are several of these explicit charges (e.g. *CH auxiliary equipment*) which are no longer required and others (e.g. *test comms hubs*) which could require amendment depending on final low-level solution design.

## 5.5. Section M 'General'

### Overview of Regulation

Section M of the SEC contains a number of 'General' provisions, which are not linked to any other particular content set out in the other sections of the SEC. Examples of SEC Section M content include; limitations of liability, Force Majeure and Intellectual Property Rights. DCC is currently consulting on proposed

changes to Section M as part of its proposed revisions to the financing arrangements in the SEC, which would extend third-party rights to financial organisations lending to DCC for CH&N financing.

### **Proposed Regulatory Impact**

We do not anticipate further changes to Section M in relation the CH&N Programme, although we will keep this under review as we finalise remaining procurements for OMS and logistics capability to support the 4G CH service.

## **5.6. Proposed Regulatory Change Process**

As we have set out in our revised delivery plan for the CH&N programme, DCC will publish the conclusions on the scope of regulatory changes (which will follow this consultation), and we expect that this will be followed with a BEIS led consultation on proposed red-line changes to the main sections of the SEC, followed by conclusions on them. We expect to provide BEIS with the information that it needs to consult on proposed changes to the main sections of the SEC in sufficient time to allow conclusions to be published before the end of October 2023.

DCC expects that these conclusions will be followed with the resultant SEC changes being laid in Parliament before being incorporated into the SEC after 40 Parliamentary sitting days.

## 6. Smart Energy Code Subsidiary Documents

DCC has assessed all of the SEC Subsidiary Document (SSD) and identified amendments in the following documents:

- SEC Appendix H 'CH Handover Support Materials'
- SEC Appendix I 'CH Installation and Maintenance Support Materials'
- SEC Appendix J 'Enduring Testing Approach Document'
- SEC Appendix AD 'DCC User Interface Specification'

A summary of changes in each of the proposed documents is described below.

### 6.1. Appendix H 'CH Handover Support Materials'

#### Overview of Regulation

As referred to within Section F, further information on the provisions relating to CHs can be found in Appendix H of the SEC - the 'CH Handover Support Materials' (CHHSM). Appendix H includes information on the Advance Shipment Notification format for CHs and the different aerial types that can be ordered via the OMS.

#### Proposed Regulatory Impact

It is expected that Appendix H will require updates to support the programme. DCC has also identified the following clauses we expect will need to be changed within Appendix H.

#### Definitions

Definitions will need to be added to reflect the multiple Service Providers in the C&S Region, as well as to explain that the Central and South Regions will be capable operating multiple technologies using multiple equipment types.

#### Order Management System

Clause 2 of the CHHSM explains that the DCC must provide each Party with access to the Order Management System for each Region via the Self-Service Interface and a public internet link. Clause 4 also details the Order Management of Communication Hubs, and we expect to require amendment to support the changes introduced by the programme. Details will be confirmed during the finalisation of low-level design.

#### Forecasting and Ordering Communications Hubs

The CHHSM states that the DCC will provide Parties with information regarding SM WAN coverage at potential Installation Locations and the WAN Variant (and, where applicable, the Communications Hub Auxiliary Equipment) required for each Installation Location via the SM WAN Coverage Database.

Changes may be required here to provide information regarding any auxiliary equipment (if needed). But beyond transitional arrangements (which will be consulted on separately), we do not expect significant change in this area.

#### Submitting Communications Hub Orders

Clause 3.10 of the CHHSM provides information Parties will need to know when placing a Communications Hub Order and stipulates that only the WAN Variants and Communication Hub Auxiliary Equipment, as indicated via the SM WAN Coverage Database, should be ordered. This section may require amendments to align with the CH&N solution. Additionally, Clause 3.11 refers to Communications Hub orders for C&S

Regions, setting out that where the order has more than 10% Mesh CHs, then the DCC may request an explanation for the quantity. This may require an amendment to amend references to Mesh CHs or equivalent technology.

### **Delivery Documentation and Packaging**

Clause 5 details the obligations on DCC prior to delivering a Consignment of CHs in terms of the documentation required, the packaging and labelling requirements and pallet sizes. It is unlikely for these obligations to change but a review will be carried out following completion of low-level design.

### **Handover Procedure**

Clause 6 details the obligations on DCC and Parties as part of the handover procedure which includes aspects such as pre-delivery checks, how to manage delivery changes and requirements around unloading. This Clause will also be reviewed once the CH&N low level designs have been agreed.

### **Handover Procedure – Special Installation Mesh Communications Hubs (South Region and Central Region)**

In the CHHSM, Clause 7 details the handover procedure specific to Mesh Communications Hubs and the aerials that are required for each Special Installation Mesh Communications Hubs. This may require an amendment to remove references to Mesh CHs, which are not expected to be part of the CH&N 4G CH solution. If any non-enduring content is required for a transitional period beyond the point at which 4G CHs are available, this will be facilitated via the NETMAD

### **Communications Hub Storage and Transit Requirements**

Clause 8 advises that Communications Hubs must be stored in accordance with Annex C of the CHHSM and that when transporting Communication Hubs, they must meet the specifications detailed in Annex D. It is considered unlikely that Clause 8 will require amendments, but it will be reviewed once the CH&N low level designs have been agreed.

### **Annexes ‘Consignment Information’ & ‘Communications Hub Pallet and Carton Quantities’**

Table 1 within Annex A of the CHHSM currently prescribes region specific details relating to each CH and each pallet of CHs for delivery. The data items within the Advance Shipment Notification (ASN) are also listed for each Region. Revisions may be needed to cover CH Marking, Advance Shipment Notification and Delivery Note. A review of the Carton and Pallet labels will also need to be conducted to ensure the current selections still apply.

Table 2 within Annex B of the CHHSM currently prescribes the North Region and the Central and South Region packaging requirements. It is expected that this table may also need amending.

## **6.2. Appendix I ‘CH Installation and Maintenance Support Materials’**

### **Overview of Regulation**

Appendix I of the SEC – the CH Installation and Maintenance Support Materials’ (CHIMSM) provides supplementary information regarding the installation and maintenance of CHs. It also includes the diagrammatical information that supports the definition of a Significant Metallic Obstruction and the description of the way in which LED indicators depict the operational status of a CH.

### **Proposed Regulatory Impact**

Our analysis indicates that the areas described below may be impacted by the programme and require changing.



## Definitions

It is expected that the new definitions for WAN Variants will need to be included.

## Special Installations and Modifications

Clause 6 of the CHIMSM explains the resolution procedure for incidents raised when Parties experience issues connecting to the SM WAN. This section is likely to be impacted and will need a review following confirmation of the low-level designs for CH&N, as it describes the different Aerial Types that can be provided in the C&S Regions and the process to follow should a Special Installation Mesh Communications Hubs need to be installed.

It is not expected for there to be additional Aerial Types for the CH&N and this will need to be made clear in the CHIMSM.

## On-Site Fault Resolution and Communications Hub Replacement

Clause 8 explains the procedure to follow should a fault be attributable to a Special Installation Mesh Communications Hub. This section will need to be reviewed and amendments made to account for General Fault Handling Procedures for new Service Providers.

## Communications Hub Returns

Clause 10 explains the processes involved in returning a Special Installation Mesh Communications Hub and Aerials so this section will need to be reviewed and aligned to the final solution for CH&N.

## Annex A 'Communications Hub Fitting and Removal Procedures'

Annex A of the CHIMSM provides the fitting procedure of a Communications Hub that a Party must follow. It also describes the installation of Aerials specifically in the Central and South Regions. It is anticipated that rules will need to be added for CH Fitting and Removal Procedures the new 4G CHs, as well as the removal of requirements relating to additional aerials.

## Annex B 'Activation Procedure'

Annex B details the activation procedures for Communication Hubs specifically in the Central and South Regions which will need to be reviewed and possibly amended depending on the final solution for CH&N.

## Annex E 'Equipment Supplied'

Annex E explains the equipment that can be supplied by the DCC to Parties via the OMS specific for the Central and South Regions. This may also need amending. Training sessions and material will be provided for the new equipment in order for Supplier Parties to ensure they are properly trained and ready to begin installations.

## 6.3. Appendix J 'Enduring Testing Approach Document'

### Overview of Regulation

The Enduring Testing Approach Document (ETAD) describes the detailed procedural and technical requirements for the Testing Services, as defined in SEC Section H14.1, that DCC will make available to Testing Participants in respects of SMETS1 Devices and SMETS2+ Devices.

### Proposed Regulatory Impact

Minor amendments may need to take place within the ETAD to accommodate the 4G CHs and 4G WAN. A full review is due to take place following the completion of low level design.

## **6.4. Appendix AD 'DCC User Interface Specification'**

### **Overview of Regulation**

Section H3 'DCC User Interface' states that communications detailed in H3.3 are to be sent via the DCC User Interface and in accordance with Section H3, Section H4 'Processing Services Requests' and the DCC User Interface Specification (DUIS).

Appendix AD – the 'DCC User Interface Specification' (DUIS) specifies the technical details of the DCC User Interface and sets out the mechanisms, formats, protocols and other technical details necessary for Users to send and receive communications to and from the DCC, as set out in Section H3.3 'DCC User Interface'.

### **Proposed Regulatory Impact**

The following updates to the DUIS have been identified as there will be a need to provide coverage information for the new WAN Services and it will be necessary for these updates to be made in time for testing to commence.

#### **Clause 3 Messages sent over the Interface 'SR8.2 Read Inventory'**

Within sub-clause 3.8.104.4, regarding the Specific Items in Data Response, additional valid values for the CSP Region Data Item may be needed for new 4G WAN.

#### **Clause 3 Messages sent over the Interface 'SR12.1 Request WAN Matrix'**

Within sub-clause 3.8.126.4, regarding the Specific Items in Data Response, additional valid values for the CSP Region Data Item may be needed for the new 4G WAN.

#### **Annex A 'DUIS Schema'**

As above, SR8.2 and SR12.1 will require updates which will also need to be reflected in Annex A.

## **6.5. Proposed Regulatory Change Process for SSDs**

DCC intends to include all the red-line changes to SSDs in a consultation process that concludes in October 2023. Thereafter, DCC expects that BEIS will use its powers to direct changes to the SSDs.

## 7. DCC Documents

### DCC Documents

Below the SSDs, there are a range of documents referred to in the SEC, which are not part of the SEC and subject to their own change control processes. DCC has reviewed these, and identified CH&N related amendments that may be required. We propose that changes will be needed to the following documents:

- Intimate Communications Hub Interface Specification (ICHIS)
- Communications Hub Supporting Information (CHSI)
- Communication Hub Order Policy (CHOP)
- Guide for Testing Participants

A summary of each of the proposed changes is described below.

### 7.1. Intimate Communications Hub Interface Specification (ICHIS)

#### Overview of Regulation

The Intimate Communications Hub Interface Specification (ICHIS) defines the mandatory features to ensure that an Intimate Communications Hub can be used with any ICHIS compliant smart meter. The ICHIS also defines the features reserved for future use or for CSP specific implementation.

The ICHIS is managed by DCC and published on the DCC website. Once proposed changes are confirmed they will be discussed with the ICHIS working group, which consists of DCC, Meter Manufacturers, BEAMA<sup>1</sup> (British Electrotechnical and Allied Manufacturers Association) and BEIS. Changes are then consulted on with Industry. We expect that we will understand the changes to be made, and the red-line amendments to the ICHIS, to be drafted following the completion of Low-Level Design.

Examples of changes that will be known post Low-Level Design are the:

- new 4G CH Communication Hub Antenna Structure (CHAS)
- antenna structure and design within the new 4G CH CHAS; and
- new noise limit for the two new 700MHz and 800MHz frequencies.

The product compliance testing includes ensuring the 4G CHs are successfully updated with general product compliance such as the UK Conformity Assessed (UKCA) product markings and Radio Frequency (RF) Performance testing.

The ICHIS may need to contain derogations for noise limits of meters, depending on the finally agreed noise-limit threshold which will be set out at the end of the PIT phase of the CH&N Programme, following a period of consultation with industry.

#### Proposed Regulatory Impact

The ICHIS will require a number of updates, as detailed above, and further explanation can be found below.

#### Glossary

The Glossary will need to be updated as the current 'CSP' definition reads "Communications Service Provider, as contracted to the Data Communications Company in Great Britain. Arqiva is the CSP in the

<sup>1</sup> BEAMA is the UK Trade Association for manufacturers and providers of energy infrastructure technologies and systems: [Our Sectors \(beama.org.uk\)](http://Our Sectors (beama.org.uk))

North Region, Telefonica are the CSP in the Central and South regions'. This definition will need to include the two new Regions/Service Area CSPs.

## **F2.0 Testing Methodology for Hosts**

Clause F2.0 of the ICHIS provides the frequency bands for the Host and testing is carried out against these frequencies using a CHAS. The CHAS variants required for testing are included in Appendix A of the ICHIS and will also require updating. DCC propose the addition of the following frequencies:

- 700 MHz
- 800 MHz

## **F4.4 Test Method**

Clause F4.4 of the ICHIS leads into the Pass Criteria for the existing frequency bands for testing and the inclusion of Pass Criteria for the two new frequencies of 700 MHz and 800 MHz will need to be added.

### **Appendix A (Rationale for CHAS selection)**

Appendix A of the ICHIS details the CHAS units which are used for testing against the ICHIS Test Specification, and this Appendix will need to be updated to add the new CHAS (4G CH) unit and rationale for the CHAS selection.

### **Appendix A (CHAS Antenna Placement)**

Appendix A of the ICHIS also details the antenna placement in the CHAS via diagrams and this Appendix will need to be updated to add the Antenna Placement diagram for the new 4G Comms Hub CHAS.

### **Appendix B (Noise Limit)**

Appendix B of the ICHIS details the Noise Limits for each frequency band and this Appendix will need to be updated to add the Noise Limit for 700 MHz and 800 MHz, CHAS detail, WAN and CSP Area.

## **Proposed Regulatory Change Process**

Changes to the ICHIS will need to be made before product compliance testing commences, and we will follow the standard ICHIS change control process (discussion at the ICHIS working group ahead of consultation with industry).

## **7.2. Communications Hub Supporting Information (CHSI)**

### **Overview of Regulation**

The Communications Hub Supporting Information (CHSI) is a specification required under clause 1.5 of the Communications Hub Handover Support Materials (CHHSM) and provides additional information for SEC Parties in relation to the packaging, Advanced Shipment Notification file formats, CH Status Information of Communications Hubs and outline descriptions for aerial types. It can be amended by DCC following consultation with relevant parties, in accordance with requirements set out in the CHHSM.

### **Proposed Regulatory Impact**

The CHSI will include necessary updates to account for the introduction of 4G CHs. Details of the proposed changes have been included below and include updates to the CH Variant labels.

### **Labelling and ASN Format**

Clause 3.2.3 of the CHSI will need to be updated to include the CH Variant labels for the 4G CHs.

### **Significant Metallic Obstructions**

The fundamentals of the Significant Metallic Obstructions will not change but the guidance detailed in Clause 4.1.2 of the CHSI may need to be updated based on the new solution and better understanding of the issue since the original drafting of this Clause. A further review of this Clause will take place following the completion of low-level design.

### **CH Status Information**

Whilst unlikely, the CH Status Information in Clause 5 may require amendments for the Central Region and South Region. A further review will take place once during low-level design. It is expected that, should there need to be any changes, then these will take place before Parties can begin forecasting.

### **Auxiliary Equipment**

The Auxiliary Equipment clause within Clause 6 of the CHSI will need a further review, again during low-level design. Whilst we do not expect it, if required, details of new Aerial Types will need to be included within Clause 6.1 for the C/S Region.

### **Appendix A 'ASN Specification'**

Appendix A of the CHSI details the composition of the Advanced Shipment Notifications when ordering Aerial Types for the Central and South Regions. It is highly unlikely that the format of the ASN files will need to be altered but the listing of the CH Variants will need to be included in the tables.

Clause A2.1 c) describes that in Table 1 'ASN Field Specifications', the 'Data Requirement' column provides information relating to additional data rules and constraints such as enumerated values, whether these data requirements are applicable to Communication Hub devices or Aerials or both, whether they are applicable to North Region or Central and South Region or both and whether they are enclosed withing double quotas or not.

The Data Requirement column of Table 1 may need to be updated, with changes being dependent on knowing the details for the new solution. The CHSI will be reviewed with this in mind during low-level design.

### **Appendix B 'LED State Indicators'**

Clause B4 may need to be added for details around the Communications Hub LED Descriptions for the 4G CHs.

### **Appendix C 'Reset (Reboot and Power Down) Timings and Processes'**

Appendix C of the CHSI currently sets out the procedures and timings for undertaking a reset of a Communications Hub for each Communications Hub Variant in each Region. Table 11 'Communications Hub wait timings' may need to be updated to include the new 4G CHs soft reset (reboot) and hard reset (power down) wait timings.

### **Proposed Regulatory Change Process**

The CHSI will be updated using standard processes, with a DCC led consultation with relevant parties. The CHSI may undergo a number of revisions ahead of the availability of 4G CHs, and we propose to liaise with affected SEC Parties on when CHSI information will be required in order to meet their needs (for example in preparing amended training guidance for meter installers).

## 7.3. Communication Hub Order Policy (CHOP)

### Overview of Regulation

The Communication Hub Order Policy (CHOP) is published on the DCC website in accordance with Section F5.18 and its objective is to apply a fair and unambiguous set of rules to determine amendments to non-SEC compliant CH orders across all Parties in a manner that balances the:

- a. Overall capability of DCC to meet non-compliant CH Orders;
- b. Level of variance against forecast tolerance for each Party's CH Order; and
- c. Total quantity of CHs ordered in each Party's non-compliant CH Order.

The CHOP provides a definition of the algorithms applied to amend CH Orders where the aggregate order quantity falls outside of the tolerances defined in the CSP contracts.

### Proposed Regulatory Impact

The CHOP may require updates, to definitions and terminology to ensure alignment with the final solution for CH&N. The fundamentals of forecasting and ordering will remain the same and will be aligned to the SEC.

### Proposed Regulatory Change Process

DCC will consult on changes to the CHOP following conclusions on the proposed red-line changes to regulation in October 2023.

## 7.4. Guide for Testing Participants

### Overview of Regulation

The Guide for Testing Participants is produced in accordance with SEC Section H14.3 and describes which persons are eligible for which Testing Services, and on what basis (including any applicable Charges).

### Proposed Regulatory Impact

The Guide for Testing Participants will require updates in line with the information required around ordering test 4G CHs and the remote test labs.

### Proposed Regulatory Change Process

DCC will consult on changes to the Guide for Testing Participants following conclusions on the proposed red-line changes to regulation in October 2023.

## 8. Assessment of the DCC Licence

The Smart Meter Communication Licence<sup>1</sup> (the 'Licence') has been reviewed by the DCC to establish whether the DCC considers that any changes would be required to accommodate the Communication Hubs and Networks programme.

### Overview of Regulation

Under its Licence, DCC provides the Authorised Business of the Licensee which comprises the Mandatory Business Service. This includes Enabling Services which comprise the Communications Hub Services, which covers the forecasting ordering and delivery of Communication Hub units, and the Enrolment Service.

### 8.1. Condition 17: Requirements for provision of Services and Appendix 1: Statement of Service Exemptions

Appendix 1 to Condition 17 of the Licence requires a Statement of Service Exemptions to be issued and maintained by the DCC. The effect of this statement is to set out the scope of the Smart Metering Wide Area Network (SM WAN) which provides connectivity between the CHs installed in consumer and small non-domestic premises and DCC Systems to enable the DCC Communications Service. It does this by stating exemptions from the requirement to provide the SM WAN. DCC have an obligation within the SEC to provide Parties with information regarding the SM WAN coverage at potential installation locations, along with the WAN Variant (and, where applicable, the Communications Hub Auxiliary Equipment) required for each Installation Location via the SM WAN Coverage Database.

The Statement itself sets out two categories of premises for which connectivity to the SMWAN will not be provided (Service Exemption Categories), and also sets out the steps DCC will take to reduce the scope of these exemptions and secure the provision of connectivity to premises within these categories, where it is technically feasible at a cost that is not disproportionate. The two categories are:

1. Premises within an area of SMWAN coverage but which cannot be connected to the SMWAN due to local environmental factors, property type or specific installation issues; and
2. Premises outside the Coverage Area within a Coverage Region.

DCC is exempt from having to serve the above locations with connectivity to the SMWAN and subsequently the corresponding premises will not appear as having coverage within the SM WAN Coverage Database.

### Proposed Regulatory Impact

We do not think it is necessary to make any changes to the DCC Licence itself, but DCC will need to review the Statement of Service Exemptions,<sup>2</sup> which is referred to within the Licence within Appendix 1 to Condition 17, as a result of the CH&N programme.

The Statement of Service Exemptions will need to be reviewed in respect of the Central and South Regions to acknowledge that the current Service Exemption Categories apply in respect of the 2G/3G WAN and to consider Service Exemption Categories for the 4G WAN. The consequence being that DCC may consider providing the 4G WAN in areas not excluded by the Statement.

DCC is obligated under its Licence to review the Statement of Service Exemptions at least once in each full Regulatory Year. DCC intends to consider necessary changes to the Statement of Service Exemptions and propose these to Ofgem where necessary. Any revisions will be published on the DCC website. DCC is planning to submit the changes to Ofgem in time for when 4G CHs are ordered in June 2024.

<sup>1</sup> Ofgem website: [Smart Meter Communication Licence](#)

<sup>2</sup> Smart DCC Website: [DCC Statement of Service Exemptions](#)

## 9. Consultation Questions

This consultation is on DCC's assessment of the scope of regulatory changes that are required to enable to delivery of the enduring CH&N Service. It will be followed by consultations on red-line changes to the SEC, and content for inclusion in the NETMAD. At this stage we are inviting general views from stakeholders on our analysis, with a specific focus on whether any content we have proposed is described inaccurately or incompletely, or whether there are changes which you think are necessary that we have not identified.

Our consultation questions are as follows:

<b>Question 1</b>	Please provide views on DCC's assessment of the scope of change set out in this consultation. Please include if you consider there are inaccuracies or where our analysis is incomplete.
<b>Question 2</b>	Do you consider there to be any additional changes that are required to the Main Body SEC or DCC Licence to support the enduring CH&N service? Please provide a rationale for your views.
<b>Question 3</b>	Do you consider there to be any additional changes that are required to the SEC SSDs or DCC documents to support the enduring CH&N service? Please provide a rationale for your views.
<b>Question 4</b>	Please provide any additional comments you have on this consultation.



# 10. Overview of analysis identifying no-impacts

## 10.1. Smart Energy Code

### 10.1.1. Section A 'Definitions and Interpretations'

#### SMETS2+ Communications Hub

The SEC currently defines 'SMETS2+ Communications Hub' as:

"means a Communications Hub which is not a SMETS1 CH."

The current drafting of the definition is considered broad enough to include the new 4G CHs and it is not proposed to amend the definition of 'SMETS2+ Communications Hub'.

#### SM WAN

The SEC currently defines 'SM WAN' as:

"means the SMETS1 SM WAN or the SMETS2+ SM WAN".

DCC believe the current definition of 'SM WAN' can remain 'as is' and that the new 4G WAN can be included within the scope of the SMETS2+ WAN.

#### Communications Hub

The SEC currently defines 'Communications Hub' as:

"means a physical device that includes a Communications Hub Function together with a Gas Proxy Function."

It is not proposed to amend the definition of 'Communications Hub' as the 4G CH will still comprise a Communications Hub Function (CHF) together with a Gas Proxy Function (GPF). It is also preferable for the SEC to remain as connectivity agnostic as possible and to not differentiate between 2G/3G/4G CH unless it is required.

#### Wide Area Network (WAN) Provider

The SEC currently defines 'Wide Area Network (WAN) Provider' as:

"means the DCC, acting in the capacity and exercising the functions of the Known Remote Party role identified as such in the GB Companion Specification."

The GB Companion Specification (GBCS) currently defines the Wide Area Network (WAN) Provider as:

"the organisation providing communications over the WAN Interface of the Communications Hub. Consequently, in the context of a specific Communications Hub, the Known Remote Party whose Security Credentials are stored in the {wanProvider, digitalSignature, management} Trust Anchor Cell."

It is therefore not proposed to amend the definition of the 'Wide Area Network (WAN) Provider' as the current definition does not differentiate between the different WAN Providers currently.

### 10.1.2. SEC Section F 'Removal and Return of SMETS2+ Communications Hubs'

DCC does not propose any amendments are required to the provisions which relate to CH Product Recall or CH returns processing.

### **10.1.3. SEC Schedule 8 GB Companion Specification (GBCS)**

The Network Evolution CH introduces new 4G WAN technology along with associated changes for Communication Service Provider connectivity and maintenance. There will be no changes to the SMETS2+ functionality and therefore there is no impact to GBCS.

### **10.1.4. SEC Schedule 9 Smart Metering Equipment Technical Specification (SMETS)**

The Network Evolution CH introduces new 4G WAN technology along with associated changes for Communication Service Provider connectivity and maintenance. There will be no changes to the SMETS2+ functionality and therefore there is no impact to SMETS.

### **10.1.5. SEC Schedule 10 Communications Hub Technical Specifications (CHTS)**

The Network Evolution CH introduces new 4G WAN technology along with associated changes for Communication Service Provider connectivity and maintenance. There will be no changes to the SMETS2+ functionality and therefore there is no impact to CHTS.

### **10.1.6. SEC Schedule 11 TS Applicability Tables (TSAT)**

The Network Evolution CH introduces new 4G WAN technology along with associated changes for Communication Service Provider connectivity and maintenance. There will be no changes to the SMETS2+ functionality and therefore there is no impact to the TSAT.

## 11. How to Respond and Next Steps

Please provide responses by **17:00 on 15 March 2023** to DCC at [consultations@smartdcc.co.uk](mailto:consultations@smartdcc.co.uk).

DCC will take into account respondents views and prepare a conclusions report for Industry and for the Department of Business, Energy and Industrial Strategy (BEIS). DCC is aiming to provide a conclusions report by no later than 31 March 2023.

The conclusions report will set out a summary of responses received and details on how DCC have addressed any concerns raised.

DCC reserves the right not to publish, or to delay publication of, referenced material or documents and/or respondent feedback for confidentiality, commercial, compliance and/or legal reasons.

Consultation responses may be published on our website [www.smartdcc.co.uk](http://www.smartdcc.co.uk). Please state clearly in writing whether you want all or any part, of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential.

Please note that responses in their entirety (including any text marked confidential) may be made available to the Department of Business, Energy and Industrial Strategy (BEIS) and the Gas and Electricity Markets Authority (the Authority), who are subject to public law duties and obligations as regards such information and its publication, entirely separate to DCC.

If you have any questions in relation to this consultation, please contact DCC via the following email address: [consultations@smartdcc.co.uk](mailto:consultations@smartdcc.co.uk).