



Communications Hubs & Networks

Consultation on phase 4
regulatory changes

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1. Introduction and context

1.1. DCC and the CH&N Programme

1. The Communications Hubs and Networks (CH&N) Programme is a Data Communications Company (DCC) initiative to define and deliver future-proofed Communications Hubs and 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 the development and implementation of options for a 4G solution.
2. To support the CH&N Programme, DCC is proposing legal drafting to be incorporated into SEC Appendix I 'CH Installation and Maintenance Support Materials' (CHIMSM) and SEC Appendix AU 'Network Evolution Transition and Migration Approach Document' (NETMAD) through designation by the Department. The purpose of this consultation is to obtain views on the proposed changes.

1.2. Previous engagement on regulatory changes

3. On 31 March 2023, DCC concluded on its initial assessment of regulatory changes that will be required for the 4G solution. In those conclusions, DCC outlined the anticipated changes required to several Smart Energy Code (SEC) Subsidiary Documents (SSDs), DCC owned documents and Main Body SEC changes.¹
4. Based on this scoping exercise by DCC, the Department for Energy Security and Net Zero (the Department) published a consultation in September 2023 on the proposed changes to the DCC Licence and the Main Body SEC (the SEC Sections) for the 4G CH&N programme. These changes are expected to be incorporated into the SEC in September 2024.
5. A few of the SEC changes are only relevant in a phased approach, e.g. when the 4G communications service itself goes live (planned for 2 December 2024) or when the mass manufacture of 4G Communications Hubs goes live (planned for 7 April 2025). To provide clarity to industry on which requirements apply when, the Network Evolution Testing and Migration Approach Document (NETMAD) acts as a transitional document to temporarily suspend the application of enduring provisions in such situations.
6. On 24 April 2024, DCC issued a consultation on changes to the NETMAD,² including a new section covering the suspension of the relevant Main Body SEC changes referred to above. DCC issued its conclusions on these changes on 13 June 2024,³ and the NETMAD was subsequently re-designated by the Department on 21 June 2024. These clauses did not include the end-dates for each suspension, as they had not been confirmed at the time. On 24 June 2024, we subsequently issued a consultation on further changes to the NETMAD including end-dates for these clauses.⁴ However, due to the short timescales some of the end-dates were not able to be determined in this consultation. DCC published its conclusions on 12 July 2024,⁵ and the NETMAD was subsequently redesignated by the Department on 19 July 2024. This consultation seeks to remove those clauses now no longer applicable to facilitate IPV go live on 2 December 2024 and the mass manufacture of 4G CHs from 7 April 2025.

¹ [Conclusions on the revised delivery plan for the CH&N Programme | Smart DCC](#)

² [CH&N Consultation on Phase 2 regulatory changes | Smart DCC](#)

³ [CH&N Conclusions on Phase 2 regulatory changes | Smart DCC](#)

⁴ [CH&N Consultation on further transitional provisions for the SEC | Smart DCC](#)

⁵ [CH&N Conclusions on further transitional provisions for the SEC | Smart DCC](#)

1.3. Previous engagement on Mesh CHs

7. The 2/3G Mesh CH solution in the Central and South Regions provides a mechanism to extend the Wide Area Network (WAN) range to premises that are outside of cellular coverage. Some CHs that are within cellular coverage can act as a “Gateway” to communicate with premises out of cellular coverage whilst some CHs outside of cellular coverage can act as a “Hop” to further extend coverage.
8. DCC has been engaging with its customers (Energy Suppliers and Meter Asset Providers (MAPs)) on the replacement of Mesh CHs, amongst other elements of the CH&N Programme, through a series of workshops and engagement with SEC Sub-Committees.⁶ The first series of workshops took place in February 2023 to June 2023 and the second series took place in November 2023 to January 2024. We have also undertaken further analysis of the potential regulatory changes required to support transitional arrangements for the coordination of 2/3G Mesh CH replacement. This engagement resulted in the proposals regarding Mesh CHs set out in our consultation issued on 24 April 2024 mentioned above. This included enduring and transitional arrangements for the replacement of Mesh CHs.
9. The enduring arrangements were included in SEC Appendix I ‘CH Installation and Maintenance Support Materials’ (CHIMSM) and included:
 - A clause requiring DCC to provide to Suppliers reporting on Mesh CHs active as a Gateway or Hop in the previous six-month period; and
 - A clause prohibiting Suppliers from replacing Active Mesh CH Gateways or Hops with a 4G CH until 31 December 2031.
10. On 13 June 2024, we issued our conclusions and stated that we would further engage industry on the details of the enduring Mesh CH reporting. Section 2 of this document forms our consultation on those changes.

1.4. Purpose and structure of this consultation

11. DCC is proposing legal drafting to be incorporated into SEC Appendix I ‘CH Installation and Maintenance Support Materials’ (CHIMSM) and SEC Appendix AU ‘Network Evolution Transition and Migration Approach Document’ (NETMAD) through designation by the Department. The purpose of this consultation is to obtain views on the proposed changes, which include provisions to facilitate the following:
 - **Enduring reporting on Mesh CHs:** Details on the enduring reporting on Mesh CHs, identifying those that have been an Active Mesh Gateway CH or an Active Mesh Hop CH in the six-month period preceding the date of issue of each report. This is covered in section 2 of this document.
 - **Enrolment and Communication Services for 4G CHs:** Removal of the clause prohibiting DCC from providing Enrolment Services and Communications Services in relation to 4G CHs to facilitate Initial Pallet Validation (IPV) Go Live on 2 December 2024. This is covered in section 3 of this document.
 - **Mass manufacture of 4G CHs:** Removal of clauses no longer applicable to facilitate mass manufacture of 4G CHs from 7 April 2025. This is covered in section 3 of this document.
12. This consultation is also seeking views on the following:
 - The re-designation date of the CHIMSM to incorporate the above provisions. This is covered in section 4 of this document.

⁶ [Conclusions on 4G Transition Strategy following collaborative workshops | Smart DCC](#)

- The re-designation date of the NETMAD to incorporate the provisions relating to Enrolment and Communication Services for 4G CHs. This is covered in section 4 of this document.
 - The re-designation date of the NETMAD to incorporate the provisions relating to mass manufacture of 4G CHs, as these changes will need to be incorporated after the changes to facilitate IPV. This is covered in section 5 of this document.
13. This consultation is expected to impact Large & Small Suppliers and Other SEC Parties, specifically Meter Asset Providers (MAPs).
14. This consultation will close on **11 October 2024 at 17:00**. Following this, DCC will provide a report to the Department by no later than 15 November 2024 containing its consideration of the responses, the proposed updated version of the CHIMSM and both versions of the NETMAD, and the proposed date for re-designation of this. DCC will publish its conclusions document on its website.

2. Provisions for enduring reporting on Mesh CHs

2.1. Background

15. DCC's consultation issued on 24 April 2024 included enduring rules for the replacement of Mesh CHs in the CHIMSM. As noted above, DCC issued its conclusions on these changes on 13 June 2024 and the resulting CHIMSM changes are due to be redesignated by the Department by 1 November 2024. We are now proposing to redesignate the CHIMSM on 2 December 2024 in parallel with the NETMAD changes for IPV Go Live set out in section 3 of this consultation.
16. A staged passive approach to Mesh CH replacement will be followed whereby the number of Mesh CHs is allowed to shrink organically. To facilitate this, a rule will apply in the SEC from the end of IPV which will prohibit the replacement of Mesh CH Gateways and Hops⁷ (including Special Installation Mesh CHs) that have been active in the past six months with a 4G Communications Hub until 31 December 2031. The rationale for this date is that it would then allow two years prior to the sunset of the 2G network in 2033 for the replacement of any remaining Mesh Communications Hubs not yet replaced. DCC will monitor and report progress on the transition away from Mesh CHs to the Communications Transition Group (CTG).
17. The CHIMSM will also require, from 1 January 2025, for DCC to provide information to Suppliers on what CHs cannot be replaced with a 4G CH (i.e. identification of Active Mesh Gateway CHs and Active Mesh Hop CHs). The CHIMSM will set out that a Mesh CH that has been active as a Mesh Gateway or Hop in the last six months cannot be replaced with a 4G CH. In our April 2024 consultation on these rules, we noted that the DCC would provide reports with details of Mesh CHs, and the details of these reports, such as the frequency, format and accessibility, would be discussed via further stakeholder engagement and the reporting requirements would subsequently be consulted upon for proposed inclusion in the SEC. Section 2.2 of this consultation now seeks views on those reporting proposals.

2.2. Enduring Mesh CH reporting details

18. The Mesh CH data from the existing 2G/3G WAN Provider will comprise at least the following fields:
- Globally unique identifier (GUID)

⁷ means a Mesh CH that is within (a Gateway) or outside (a Hop) range of mobile cellular radio technology, and which connects to one or more other Mesh CHs that are also outside the range of mobile cellular radio technology via wireless mesh radio technology for the purpose of connecting those Mesh CHs to the SM WAN.

- Mesh Type e.g.
 - Gateway
 - Hop
 - Leaf
 - SKU2 Cellular + Mesh⁸
 - Postcode
 - Confirmation on whether the GUID has been an active Gateway or Hop in the last six months
 - Yes/No
19. The DCC will provide the details for all Mesh CHs and ensure the Suppliers associated with those CHs are anonymised.
 20. The data will be updated monthly, and the historical view of the data will be able to confirm if the Mesh CH has or has not acted as either a Gateway or a Hop in the last six months.
 21. The data will be securely housed within DCC's SharePoint to allow SEC Parties to have access to the Mesh data whenever they require. This will ensure the data is easily accessible and Parties will not need to send a request to DCC each time they wish to access the data.
 22. The draft changes to the CHIMSM for this can be found in Attachment 1 of this document. This has been drafted against version 5.2 of the CHIMSM which we included in our consultation conclusions issued on 13 June 2024.

Q1

Do you have any comments on the proposed details for the enduring reporting on Mesh CHs?

Q2

Do you have any detailed comments on the legal drafting in SEC Appendix I (CHIMSM)? Please provide your rationale.

2.3. Use of the Coverage Checker

23. In response to our consultation issued on 24 April 2024, we received comments from three Large Suppliers requesting that enduring Mesh CH information also be provided via the coverage checker. In our conclusions, we confirmed that we would work with industry to develop an enduring and cost-effective way of providing information that supports Supplier business processes for the replacement of Mesh CHs. We noted that we could explore providing this information via the coverage checker if Parties felt that this would be of benefit. However, we noted that this would require a DUIS change which would incur additional cost and time to deliver and would require a value for money impact assessment. Considering the absence of requirements and the estimated timescales to design, build and test DUIS changes, we consider this change cannot be implemented any earlier than the November 2025 SEC Release. We also note that the June 2025 SEC Release⁹ already contains DUIS impacting SEC modifications. Therefore, if this change was able to be implemented in the November 2025 SEC Release, it would result in two DUIS uplifts within a calendar year.
24. On 5 September 2024, DCC sought views from the Technical Architecture and Business Architecture Sub-Committee (TABASC) on the value of progressing this change. The TABASC recommended that despite the potential timescales, DCC should continue to assess the change

⁸ SKU2 is a Mesh capable CH that is within WAN range but has no dependent CH on it via Mesh.

⁹ [June 2025 SEC Release - Smart Energy Code \(smartenergycodecompany.co.uk\)](https://www.smartenergycodecompany.co.uk)

required to provide Mesh CH data via the coverage checker. This would provide Users with an automated solution to identify those Mesh CHs that should not be replaced with 4G CHs. It also suggested ways of providing data via the coverage checker that wouldn't impact the DUIS, in order to minimise cost and timescales. It recommended DCC consider these recommendations in its assessment.

25. DCC will engage Users further to better understand their requirements separately to this consultation. This will allow DCC to develop the most effective way to update the coverage checker and provide an indicative cost for this change to help inform the cost benefit analysis of progressing this further. We will consult industry in due course once we have completed our assessment and have a firm understanding on the potential cost of this change. If any Users consider DCC should not continue to assess this change, we recommend they respond to this consultation to provide their views.

Q3

Do you agree DCC should continue to assess the change to make Mesh CH data available via the coverage checker? Please provide your rationale.

3. Controlling the application of the 4G changes to the SEC

26. In September 2023, the Department consulted on Main Body SEC changes to provide the 4G CH arrangements. These changes include:
- The right for Parties to place forecasts and orders for unconstrained quantities of 4G CHs;
 - Requirements for DCC to provide unconstrained quantities of ordered CHs that rely on 4G mobile communications technology; and
 - Requirements for DCC to provide Enrolment Services and Communications Services using 4G mobile communications technology.
27. These changes are expected to be added to the SEC in September 2024.
28. However, the above services do not need to be provided September 2024. Provisions were therefore included in the NETMAD on 21 June 2026 to suspend these services for 4G CHs, and again on 19 July 2024 to include the points at which they should be disapplied and therefore removed from the NETMAD.

3.1. Enrolment and Communication Services for 4G CHs

29. The Main Body SEC changes will require DCC to provide the Enrolment Services and Communications Services for the 4G service. However, these services should not be provided until the start of the IPV Stage, scheduled to begin on 2 December 2024. As such, the NETMAD was updated to switch off these requirements for the 4G service (NETMAD clause 9.1(d)).
30. The disapplication of this suspension is dependent on the Department's decision on the Live Service Criteria (LSC) for the commencement of IPV. The JIP Milestone for this LSC decision is currently set for 29 November 2024. Should the Department approve the commencement of IPV, and therefore the requirement for DCC to provide the Enrolment and Communications Services for the 4G service, the NETMAD will be updated via a further designation to remove this clause. It is the removal of this clause that marks the point at which IPV can commence.
31. Therefore, we are proposing the removal of Clause 9.1(d) of the NETMAD (subject to the Department's LSC decision) to facilitate IPV Go Live on 2 December 2024.

32. The proposed changes to the NETMAD for this can be found in Attachment 2. These changes have been drafted against the version of the NETMAD that was designated on 19 July 2024.

Q4

Do you agree with the proposed removal of Clauses 9.1 (a) and 9.1(d) from the NETMAD to enable the provision of Enrolment Services and Communications Services for IPV Go Live? Please provide your rationale.

3.2. Forecasting, ordering and delivering 4G CHs

33. The Main Body SEC changes referred to above update the enduring obligations to allow Parties to forecast and order 4G CHs in unconstrained quantities, and for DCC to then deliver these. However, Parties and DCC will not be required to do these activities at the point these changes are introduced. As such, the NETMAD was updated to switch off these provisions for 4G CHs (NETMAD clauses 9.1(a), (b) and (c)). The clause to switch off the 4G CH forecasting provisions (NETMAD clause 9.1(a)) already includes an end-date of 1 October 2024 from which it will no longer apply.
34. The mass ordering and mass delivery of 4G Communications Hubs should only be enabled following the Department's decision on the Live Services Criteria (LSC) for the commencement of the mass manufacture of 4G CHs. The DCC would not be permitted to manufacture or deliver 4G CHs until the Department determines that the LSC have been met. Consequently, it would not be appropriate to allow Parties to formally submit their orders prior to this point, as if the LSC were not met, those orders could not then be fulfilled by DCC. The Joint Industry Plan (JIP) Milestone for this LSC decision is currently set for 7 April 2025. Orders of 4G CHs for delivery in July, August or September 2025 would then need to be confirmed by Parties by 11 April 2025, as set out in the NETMAD. Given this short window, DCC will work with Parties to enable orders to be submitted in the run-up to the LSC decision, but they will not be confirmed and processed until after the LSC decision has been made.
35. NETMAD clauses 6.3 and 9.1 clarify that until this approval has been received, DCC would not be permitted to manufacture or deliver 4G CHs other than those that are required for IPV, and Parties will not be able to submit mass orders for 4G CHs. Should the Department approve the commencement of the mass manufacture of 4G CHs, the NETMAD will be updated on 7 April 2025 via a further designation to remove these clauses. This section forms our consultation on the removal of the following clauses from 7 April 2025 to facilitate the ordering and mass manufacture of 4G CHs:
- 6.3(a) which prohibits Parties from submitting a 4G CH order until this clause is removed
 - 9.1(b) which prohibits Parties from submitting a 4G CH order except where provisions in the NETMAD specify otherwise
 - 9.1(c) which prohibits DCC from manufacturing or providing 4G CHs other than for the purpose of IPV
36. The proposed changes to the NETMAD for this can be found in Attachment 3. These changes have been drafted against the version of the NETMAD included as Attachment 2 to this consultation, and which we expect to be designated on 2 December 2024.

Q5

Do you agree with the proposed removal of Clauses 6.3(a), 9.1(b) and 9.1(c) to enable the ordering and mass manufacture of 4G CHs? Please provide your rationale.

4. Redesignation of the NETMAD (for IPV) and the CHIMSM

37. DCC has consulted on two versions of the NETMAD as they will need to be designated at different times. We consider that the first version of the NETMAD (Attachment 2), including the removal of Clauses 9.1(a) and 9.1(d), will require re-designation in time to support IPV Go Live. This is due to DCC needing to be able to provide Enrolment and Communication Services for 4G CHs for IPV. As such, DCC proposes that the NETMAD (Attachment 2) should be re-designated no later than 2 December 2024 (or within one month thereafter as a contingency measure if required). The disapplication of the suspension at Clause 9.1(d) is dependent on the Department's decision on the LSC for the commencement of IPV. The JIP Milestone for this LSC decision is currently set for 29 November 2024. Should the Department approve the commencement of IPV, and therefore the requirement for DCC to provide the Enrolment and Communications Services for the 4G service, we would expect the Department to redesignate the NETMAD to remove this clause.
38. The CHIMSM changes including the details for the enduring reporting on Mesh CHs need to be in place by 1 January 2025 in line with the required start date for the provision of the reporting. As noted in section 2.1 above, DCC's consultation issued on 24 April 2024 included enduring rules for the replacement of Mesh CHs, with the resulting CHIMSM changes due to be redesignated by 1 November 2024. However, for efficiency, DCC proposes that the CHIMSM (including the proposed changes in this consultation) should be re-designated in parallel with the NETMAD mentioned above, no later than 2 December 2024 (or within one month thereafter as a contingency measure if required). We also note that if there is a further DUIS change to enable providing data on Mesh CHs via the coverage checker, this would be delivered through a further SEC change delivered at a later date.
39. Draft directions for the redesignation of the CHIMSM and the NETMAD can be found in Appendices A and B respectively of this consultation document.

Q6

Do you agree with the proposed redesignation date for the NETMAD and the CHIMSM of 2 December 2024 (or as soon as reasonably practicable within one month thereafter)? Please provide your rationale.

5. Redesignation of the NETMAD (for mass manufacture)

40. We consider that the second version of the NETMAD (Attachment 3), including the removal of Clauses 6.3(a), 9.1(b) and 9.1(c), will require re-designation in time to support mass manufacture of the 4G CHs following the Department's LSC decision on 7 April 2025. As such, DCC proposes that the NETMAD (Attachment 3) should be re-designated no later than 7 April 2025, or as soon as reasonably practicable within one month thereafter as a contingency measure if required. The disapplication of the suspension at Clauses 6.3(a), 9.1(b) and 9.1(c) is dependent on the Department's decision on the LSC for the commencement of mass manufacture. The JIP Milestone for this LSC decision is currently set for 7 April 2025. Should the Department approve the commencement of mass manufacture, we would expect the Department to redesignate the NETMAD to remove these clauses.
41. A draft direction for the redesignation of the NETMAD can be found in Appendix C of this consultation document.

Q7

Do you agree with the proposed redesignation date for the NETMAD of 7 April 2025 (or as soon as reasonably practicable within one month thereafter)? Please provide your rationale.

6. Next steps

42. Following the closure of this consultation, DCC will assess respondents' views, and amend the draft changes to the CHIMSM and the NETMAD. DCC will then submit amended versions of these documents to the Department that it considers suitable for re-designation into the SEC by the Secretary of State.
43. DCC is aiming to provide a report to the Department by no later than 15 November 2024. This report will contain DCC's consideration of the responses to this consultation as well as the proposed updated version of the CHIMSM and the NETMAD, as well as the proposed date for re-designation of these documents. DCC will publish its conclusions document on its website.

7. How to respond

44. Please provide responses using the attached response form by **17:00 on 11 October 2024** to DCC at consultations@smartdcc.co.uk.
45. Consultation responses may be published on our website (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 and the Gas and Electricity Markets Authority (the Authority). Information provided to the Department or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If the Department or the Authority receive a request for disclosure of the information, we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.
46. If you have any questions about this consultation, please contact us at consultations@smartdcc.co.uk.

8. Attachments

47. This consultation includes two attachments:
- **Attachment 1:** Proposed changes to SEC Appendix I (CHIMSM)
 - **Attachment 2:** Proposed changes to SEC Appendix AU (NETMAD) for IPV
 - **Attachment 3:** Proposed changes to SEC Appendix AU (NETMAD) for mass manufacture

- Attachment 4: Consultation response template

Appendix A – CHIMSM draft direction text

This appendix contains the text that the Department plans to use for direction of changes to the CHIMSM.

This direction is made for the purposes of the smart meter communications 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 Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 2 December 2024, the CH Installation and Maintenance Support Materials (CHIMSM) previously designated and incorporated into the SEC as Appendix I is hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.

For the avoidance of doubt such re-designation of the CHIMSM shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or the continuing effectiveness of anything done in this document prior to its re-designation (which shall have effect as if done under the re-designated document).

This direction is also being notified to the SEC Administrator.

Appendix B – NETMAD draft direction text (IPV)

This appendix contains the text that the Department plans to use for direction of changes to the NETMAD.

This direction is made for the purposes of the smart meter communications 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 Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 2 December 2024, the Network Evolution Transition and Migration Approach Document (NETMAD) previously designated and incorporated into the SEC as Appendix AU is hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.

For the avoidance of doubt such re-designation of the NETMAD shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or the continuing effectiveness of anything done in this document prior to its re-designation (which shall have effect as if done under the re-designated document).

This direction is also being notified to the SEC Administrator.

Appendix C – NETMAD draft direction text (mass manufacture)

This appendix contains the text that the Department plans to use for direction of changes to the NETMAD.

This direction is made for the purposes of the smart meter communications 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 Condition 22 of the DCC Licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from 7 April 2025, the Network Evolution Transition and Migration Approach Document (NETMAD) previously designated and incorporated into the SEC as Appendix AU is hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.

For the avoidance of doubt such re-designation of the NETMAD shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or the continuing effectiveness of anything done in this document prior to its re-designation (which shall have effect as if done under the re-designated document).

This direction is also being notified to the SEC Administrator.