

# Future Service Management

## DCC conclusions on the SEC Variation Testing Approach Document

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# 1. Introduction and context

## 1.1. Purpose of this document

1. The purpose of this document is to conclude on the Data Communications Company's (DCC's) recent consultation on the proposed drafting of the Future Service Management (FSM) Smart Energy Code (SEC) Variation Testing Approach Document (SVTAD). Based on stakeholder feedback, DCC is not proposing any amendments to the FSM SVTAD drafting that was consulted upon.

## 1.2. The FSM Programme

2. The DCC Service Management System (DSMS) is a critical part of DCC's infrastructure, used to track and resolve issues across the smart metering network. Customers use DSMS to request DCC services, raise incidents, and access reporting and diagnostics information. This system handles a high volume of activity, with around 25,000 separate requests or incidents raised through it each month. The current DSMS service is supported under the existing Data Service Provider (DSP) contract.<sup>1</sup> However, the tool is now coming to the end of its life and a new solution is required to mitigate service and security risks to the smart meter network.
3. The FSM Programme was initiated in June 2023 to competitively procure and implement a replacement tool ahead of the new DSP service commissioning in 2026. The scope of this programme is to:
  - Replace the existing scope of DSMS, including the Self Service Interface (SSI) and the Self Service Management Interface (SSMI); and
  - Incorporate Order Management System (OMS) capabilities for the ordering of 4G Communications Hubs (CHs) and the returns of all Smart Metering Equipment Technical Specifications 2 (SMETS2) CHs.
4. In addition to replacing the tool, DCC will be retiring the use of User Interface (UI) DCC Key Infrastructure (DCKI) personnel certificates to access the DSMS and replace them with multi-factor authentication (MFA) to access the new solution. MFA is a widely used and trusted approach to authenticating the person logging in to a site by requiring them to provide two or more pieces of evidence (for example entering a password, using a security token or authenticator device, or using biometrics).
5. The current DSMS service is provided through the Remedy platform which is an IT Service Management tool. The support contract for Remedy is due to expire in October 2025 and DCC is implementing a new platform as a replacement for the existing DSMS. Following it being recommended by all bidders during our procurement exercise, DCC has selected ServiceNow as the platform to be used for FSM. ServiceNow is a flexible cloud-based 'software as a service' tool offering several Service Management aspects either 'out-of-the-box' or via configuration or customisation

## 1.3. Direction to produce the SVTAD

6. On 17 September 2024, in accordance with SEC Section X11.4, the Secretary of State directed DCC to develop a draft SVTAD for the variations to the SEC being considered to enable the introduction of the FSM Programme (the 'FSM SVTAD').

<sup>1</sup> The DSP and other services delivered under the data services contract sit right at the heart of the smart metering infrastructure, by providing data services that connect DCC Users (such as Energy Suppliers, Network Operators and Other Users) to Devices at their consumers' premises.

7. The general requirements for the contents and development of an SVTAD are set out in SEC Section X11. These include testing objectives, the testing to be undertaken, and the environments to be used.
8. The Direction received from the Secretary of State requires that the FSM SVTAD should:
  - Provide for the detailed test approach that will apply to enable DCC to introduce and transition to the FSM arrangements (being (a) a new service management and incident management system, (b) a new 4G CH forecasting and ordering management system, and (c) a system to support the returns process for all CH) and for this to be set out in associated documents to be developed by DCC.
  - Provide for DCC to revise these documents in accordance with any request made by the Secretary of State.
  - Provide for where these documents need to be submitted to the Testing Advisory Group (TAG) for approval (with any disagreement being submitted to the Secretary of State for final determination).
9. In accordance with SEC Section X11.6, any SVTAD developed by DCC needs to be submitted to the Secretary of State following consultation with SEC Parties and the TAG. DCC has been directed to complete this by 27 December 2024

## 1.4. Consultation responses and next steps

10. This consultation, issued in October 2024, sought views on:
  - The proposed drafting for the FSM SVTAD. The views received and DCC's responses are covered in section 2.1 of this document.
  - The proposed designation date for incorporating the FSM SVTAD into the SEC. The views received and DCC's responses are covered in section 2.2 of this document.
11. Based on stakeholder feedback, DCC is not proposing any amendments to the FSM SVTAD drafting that was consulted upon.
12. DCC will submit its conclusions to the Secretary of State on 6 December 2024. Subject to the Department for Energy Security & Net Zero's (DESNZ) (the Department) approval, the FSM SVTAD is due to be incorporated into the SEC on 20 December 2024 (or within one month thereafter).

## 2. Analysis of responses

13. DCC received three written responses to this consultation: one from a Large Supplier, one from a Network Party and one from the TAG.
14. DCC has analysed the feedback provided. This section sets out an overview of the responses received to this consultation and DCC's response.

### 2.1. Question 1

15. DCC sought views on the proposed drafting of the FSM SVTAD.

**Q1**

Do you agree with the proposed SVTAD for the FSM Programme? Please indicate any areas of disagreement and your rationale for this

## Respondent views

16. Two respondents agreed with the proposed FSM SVTAD, although one of these noted that the interaction between the TAG and the DCC Testing Advisory Board (TAB) was not the usual governance approach and could create inefficiency.
17. The third respondent did not disagree with the proposed FSM SVTAD, and raised two comments:
  - The respondent considered that paragraph 19 and section 2.3 from the consultation document were inconsistent. They considered that paragraph 19 stated that Systems Integration Testing (SIT) cannot start until the TAG has agreed that Pre-Integration Testing (PIT) has completed, while section 2.3 stated the TAG will only receive the final test completion Report and will not approve PIT exit (this being done by the TAB).
  - The respondent commented on the DCC's view on Mandated User Testing, considering it inappropriate to include this in a formal SEC section.

## DCC response

### *TAB and TAG roles*

18. We acknowledge the views that the interaction between the TAG and DCC's TAB is not the usual governance approach. We also note that the comments summarised in paragraph 17 above were made against the consultation document. This document summarised the background to the FSM SVTAD, but the SVTAD drafting is paramount. Nevertheless, we acknowledge that the consultation document could have been clearer.
19. Paragraph 19 of the consultation document covers the need to agree the test approach documents for a test phase with the TAG, specifically the Test Approach Document (TAD), the Test Coverage Document (TCD) and the Coverage of Testing Documents (CTDs). Paragraph 29 of the consultation document then explains that approval of these products will be sought from the TAG prior to PIT completion. This is reflected in the SVTAD drafting which makes gaining TAG agreement to these test approach documents a requirement for the completion of the PIT phase (clause 2.6) and entry into the SIT phase (clause 2.13). This approach reflects the value that DCC sees in having the TAG review the scope of testing across all test phases.
20. Section 2.3 of the consultation document covers Test Completion. Paragraph 29 summarises that PIT completion will be approved by DCC's TAB with the Test Completion Report being shared thereafter with the TAG for information only. Paragraph 30 then explains that SIT completion will be approved by the TAG. This explanation extends beyond the SVTAD drafting by explaining how PIT will be governed. SIT will also be subject to TAB agreement prior to consideration by TAG. This SIT governance is standard DCC practice with the TAB's decision supporting the promotion of code from SIT to User Integration Testing (UIT), albeit that formal UIT opening to Test Participants will only occur following the TAG's agreement.
21. Section 6 of the SVTAD addresses SIT completion and the role of the TAG and the SEC Panel in agreeing its completion. The SVTAD does not refer to PIT completion as this activity is being governed by the TAB which is an internal DCC governance body. Similarly, there is no specification of the role of the TAB in the SVTAD drafting
22. Given that the two referenced sections relate to two different matters (the approval of the test approach documents and the approval of test completion), the approaches DCC is proposing for these are therefore not inconsistent. We are therefore not planning to change the wording.

### **Mandatory User Testing**

23. Paragraph 31 of the consultation document reflected DCC's belief at the time the consultation was issued that some mandatory User testing would be required. We believe it is important to share our current thinking with Parties.
24. The option of mandating User testing is facilitated, but not dictated, by the proposed wording in the FSM SVTAD. Rules setting out what DCC would have to do should it conclude that User testing needs to be mandated are specified. The drafting around mandated User testing in the FSM SVTAD follows the same approach that was used in the recent Communications Hub & Networks (CH&N) SVTAD (SEC Appendix AQ).
25. Under the draft wording, clear controls over exercising the option of mandating User testing are documented in the FSM SVTAD. Where exercised, a User Testing Services Approach Document (UTSAD) would need to be produced and consulted on with the TAG, SEC Parties and other relevant stakeholders. These views and DCC's responses would then be submitted to the Secretary of State who would approve the document or provide DCC with direction. Importantly, a mandate could not be introduced unilaterally by DCC but would require the approval of the Secretary of State.
26. The alternative approach would be to draft the FSM SVTAD with User testing either as mandatory or optional. This introduces the risk of having to conduct a further consultation on changes to the SVTAD should the selected option not be followed.
27. Since this consultation was issued, DCC has reconsidered its approach and has concluded that the intent of the proposed mandated testing can be achieved through an alternative approach using SEC Appendix AU 'Network Evolution Transition and Migration Approach Document' (NETMAD). We will be consulting on these changes as part of the upcoming consultation on the regulatory changes required for the FSM Programme, which we expect to issue in mid-December 2024. However, while our current intention is now to not mandate User Testing, DCC believes the option should be retained in the SVTAD pending the consultation on the use of the NETMAD.

## **2.2. Question 2**

28. DCC sought views on the proposed designation date for incorporating the SVTAD into the SEC.

**Q2**

Do you agree with the proposed designation date for the SVTAD of 20 December 2024 or within one month thereafter? Please provide your rationale

### **Respondent views**

29. All three respondents agreed with the proposed designation date for the FSM SVTAD.
30. One respondent noted an apparent trend towards overlapping test artefact review cycles and consultation windows. They considered this to not be best practice and could lead to inefficiencies for both DCC and industry.

### **DCC response**

31. As noted in the consultation, we intend for the FSM SVTAD to be designated and incorporated into the SEC on 20 December 2024 (or within one month thereafter).
32. We acknowledge the comment around overlapping test artefact review cycles and consultation windows. We note that this consultation was focused on the proposed wording for the FSM SVTAD, and not on the test artefacts it requires be produced. DCC and the TAG previously agreed

the approach of preparing and reviewing the test artefacts in parallel with the FSM SVTAD consultation, again in recognition of the timescales for delivering the FSM Programme.

### 3. Summary of drafting changes

33. After reviewing the responses received, DCC is not proposing any changes be made to the version of the FSM SVTAD that was consulted upon. This version can be found in Attachment 1 to this document.

### 4. Next steps

34. DCC is of the view that it has had appropriate engagement and consultation with industry on the proposed drafting for the FSM SVTAD. As the responses to the consultation and engagement in industry were supportive of the proposed drafting, DCC will submit this to the Department for incorporation into the SEC.
35. DCC has, where necessary, addressed the comments that have been received from industry. DCC does not believe that the views expressed result in fundamental amendments to the FSM SVTAD drafting and, as such, further consultation is neither necessary nor appropriate.
36. In summary, DCC considers that the FSM SVTAD is fit for purpose.

### 5. Attachments

- Attachment 1: Proposed FSM SVTAD