



E.ON response to DECC; consultation on New Smart Energy Code (SEC) Content January 2015

General Comments

We are comfortable with many of the proposals, in this consultation.

The proposal to introduce into the Smart Energy Code (SEC), drafting to enable the Secretary of State to request from the Data Communication Company (DCC) a new commencement date is sensible. However, this does introduce an element of risk with regards to the timing of the phases. This risk should be mitigated through clear communication and programme oversight from the DECC Smart Metering Implementation Programme and greater transparency on the progress of activities undertaken by the DCC to ensure all parties are fully informed at all times.

We welcome the inclusion of an obligation on the DCC to provide informal testing. We believe informal testing will provide significant benefit in reducing the risk of service user integration plans and support de-risking of the DCC delivery plans, as the DCC will get early sight of any potential defects that would otherwise not arise until formal User Entry Process Testing (UEPT).

We are concerned that the DCC has the right to prioritise delivery activities over the development and support of a pre-User Integration Testing (pre-UIT) environment and development of a GBCS Interface Testing (GIT) for Industry (GFI) tool. Service user integration plans need to be based on robust assumptions over the availability (and support of) the pre-UIT environment. We believe the current proposal will allow the DCC to redirect resources to protect internal plans, at the expense (cost and time) of service user testing.

We request that the incremental delivery of functionality available (including GFI) in the pre-UIT environment is clearly documented and linked to milestones tracked on the Joint Industry Plan (JIP) by the Implementation Managers Forum (IMF). This will enable service users to align their internal delivery plans against the incremental delivery of functionality from the DCC and to be in a position to test, as it is released.

We also recommend that Informal Testing includes provision of test communication hubs from both Communication Service Providers. Further details are required in relation to the capability and availability of test communication hubs, which is creating uncertainty for device manufacturers and supplier testing plans.



Answers to specific questions;

Notifying new commencement dates for SEC testing phases

Question 1: Do you agree with our proposal and legal drafting to introduce into the SEC a mechanism for the Secretary of State to request from the DCC a new commencement date for SIT, IT, E2E or SRT Testing? Please provide a rationale for your response.

Yes, this is sensible. However, the proposals do potentially provide additional risk to parties as this introduces a degree of uncertainty as to the exact timing of the testing phases and therefore makes planning difficult. This risk should be mitigated through clear communication and programme oversight from the DECC Smart Metering Implementation Programme. In addition we request greater transparency on the progress of activities undertaken by the DCC to ensure all parties are fully informed at all times. This should avoid issues we have seen recently where the RAG status at the Implementation Managers Forum changes from Green to Red with no early warning.

Informal Testing

Question 2: Do you agree with the proposed provisions for informal testing in the SEC? Please provide a rationale for your views.

- a) Whether you agree with the strength of the obligation on DCC to offer the service***
- b) Whether you agree that DCC can determine the detailed rules to apply to use of the service;***

We welcome the inclusion of an obligation on the DCC to provide informal testing. We believe informal testing will provide significant benefit in reducing the risk of service user integration plans and support de-risking of the DCC delivery plans, as DCC will get early sight of any potential defects that would otherwise not arise until UEPT.

Informal Testing will facilitate a more agile approach to development as we will be able to test DCC services incrementally and allow us to enter User Integration Testing with;

- a) a higher degree of confidence having first successfully proven our integration in the pre-UIT environment; and
- b) an expectation that we will be able to pass UEPT quickly and move into End to End testing which is of more value to service users.

We are concerned that the DCC has the right to prioritise delivery activities over the development and support of a pre-UIT environment and development of a GBCS Interface Testing (GIT) for Industry (GFI) tool. Service user integration plans need to be based on robust assumptions over the



availability (and support) of the pre-UIT environment. We believe the current proposal will allow the DCC to redirect resources to protect internal plans, at the expense (cost and time) of service user testing.

Whilst we understand that the availability of functionality in the pre-UIT environment will be determined on the progress of Pre Integration Testing/ System Integration Testing (PIT/SIT), the DCC has sufficient time to mobilise and ring fence resources to support the pre-UIT environment. In addition in its replan proposals, the DCC has recognised the benefits that informal testing will deliver. We therefore request that the incremental delivery of functionality available in the pre-UIT environment is clearly documented and linked to milestones tracked on the Joint Industry Plan (JIP) by the Implementation Mangers Forum (IMF). This will enable service users to align internal delivery plans against the incremental delivery of functionality and so be in a position to test as it is released.

The concept of informal testing is not new. This was a cornerstone of the original SMIP test approach¹ (via the 'sandpit' environment) published January 2013. We have maintained the importance of this environment throughout our ongoing engagement with both DECC and latterly the DCC and have been pushing for clarity around its provision ever since its publication. For example we have raised it onto the IMF RAID log. Our development approach is firmly based on leveraging this capability to de-risk our internal delivery plans and request DECC recognise this as a critical dependency to service users and track on the Joint Industry Plan.

In relation to the provision of GFI, we agree with the strength of the obligation to offer this service, and would encourage availability as early as possible for device manufacturers and suppliers. Based on our recent interaction with device manufacturers, not all will have a fully compliant and accredited device available in production volumes for either of the proposed DCC go live dates, therefore access to a test service, tool or environment can only serve to:

- a) Accelerate existing device development timelines, and
- b) Provide a more robust manufacturer internal testing regime, which should mitigate problems with devices arising during external testing (i.e. Smart Metering Device Assurance (SMDA) testing) and supplier device testing activities. Resolution of issues raised during SMDA or supplier testing has the risk of needing a potential firmware update, followed by device regression testing, potentially impacting on

¹**SMIP Test Approach, January 2013 (p.18)**

31. DSP Service Providers will provide a sandpit test environment for DCC Service Users ahead of Interface testing to allow them to prepare their test systems. This test environment will be functionally representative of the intended solution supporting all day 1 core and elective service requests.



parallel or subsequent device accreditation activity (for example CPA testing which must be completed on final Firmware versions), which has the potential to delay product availability further.

We intend to undertake device testing at our own facilities to support our procurement activities. We would therefore also benefit from GFI as early as possible to ensure our evaluation activity and detailed product assurance testing replicates "real" interactions and environments as closely as possible.

We are concerned that the DCC has the right to prioritise delivery activities over the development and support of GFI. For the timely roll out of smart meters, availability of robustly tested compliant devices is as vital as a fully operational DCC. Any delay or removal of support for GFI may be counterproductive if product development and testing is affected and there are no devices available for installation at DCC go live.

We also recommend that Informal Testing Services includes the obligation to provide test communication hubs from both Communication Service Providers. Further details are required in relation to the capability and availability of test communication hubs, which is creating uncertainty for device manufacturers and Supplier testing plans.

Question 3: Do you agree with the proposed SEC amendments for informal testing as set out in the letter of direction? Please provide a rationale for your views.

Yes, this is sensible.

DCC Key Infrastructure Policy Management Authority (DCCKI PMA)

Question 4: Do you agree with our proposals and legal text in relation to the DCCKI PMA Function? Please provide a rationale for your response.

Yes, this is sensible.

Question 5: Do you agree that, for the purposes of transition, any proposed modification to the SEC proposed by the DCC in the interest of continuing to comply with the SEC Objectives and its obligations under Section G (Security) should be directed to the Secretary of State? Please provide a rationale for your response.

Yes. However it should be noted that the Security Sub Committee referenced in para.38 has yet to be established. We assume that in the interim should there be a requirement for any notification to the Security Sub Committee from the DCC that it will in fact be notified to the Transitional Security Expert Group.



Changes to when Communications Hub can be ordered

Question 6: Do you agree that the period for the submission of the first forecasts of communications hubs orders by SEC Parties should be aligned with those for subsequent forecasts, such that the initial forecast is submitted during the month ending 10 months in advance of the relevant delivery month?

Yes. We are comfortable with these proposals.

Minor Consequential Change to electricity and gas supply licences

Question 7: Do you agree with the consequential changes we are proposing to electricity and gas supply licence conditions on information requirements by Ofgem for monitoring and evaluation?

Yes. It is sensible to correct these errors in the drafting of the licence.