

SMETS1 Conclusions on MAM and MEHRS Changes DCC Conclusions on changes to the MAM to support migration of split sites and minor drafting changes to improve clarity to the MEHRS.

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1. Introduction and Context

A number of energy suppliers have installed first generation smart devices (known as SMETS1 devices) in consumers' premises across Great Britain. The Data Communications Company (DCC) has designed a solution for the enrolment of SMETS1 devices into its network. Part of DCC's plan to deliver SMETS1 services involves a detailed approach for migrating SMETS1 Installations into DCC's systems. The detailed technical and procedural requirements of this approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD) which was designated by the Secretary of State on 28 July 2019 and included in the Smart Energy Code (SEC) from version 6.14 onwards as Appendix AL of the SEC. The current TMAD was designated by the Secretary of State on 30 March 2021 and included in the Smart Energy Code (SEC) as version 12 Appendix AL of the SEC.

Clauses 8.8 to 8.10 of the TMAD covers the arrangements for initial development and subsequent change of the Migration Error Handling and Retry Strategy (MEHRS). The recently baselined version of the MEHRS covers the Initial Operating Capability (IOC), Middle Operating Capability (MOC – MDS and Secure) and changes to include the Final Operating Capability (FOC) for Release 1 were concluded upon by the DCC on 1 December 2020 following a consultation with Industry.

Sections 4.35 to 4.44B of the TMAD sets out details of Migration Authorisations and the Migration Authorisation Regime. This includes details of the process that DCC is required to undertake when making changes to the Migration Authorisation Mechanism (MAM). The current version of the MAM was published by the DCC on 28 January 2021¹ and came into effect on 18 February 2021.

On 11 March 2021, DCC consulted on proposed changes to the MAM and MEHRS².

This document provides a response to these consultations consistent with the regulatory requirements set out in TMAD.

2. Stakeholder Engagement

This section details DCC's stakeholder engagement that has taken place in relation to the proposed revisions to the MAM.

Stakeholders were invited to respond to the consultation issued on 11 March 2021 by 16:00 on Thursday 25 March 2021 using the separate response templates that were provided.

DCC Received five responses to the consultation which all provided similar feedback.

3. Consultation Questions & Responses

3.1. Questions

The consultation posed the following questions related to the proposed changes:

¹ DCC Conclusion on the Migration Authorisation Mechanism (MAM) (smartdcc.co.uk)

² https://www.smartdcc.co.uk/customer-hub/consultations/changes-to-the-mam-and-mehrs-for-foc/

MAM/MEHRS Q1	Do you have any comments on the proposed change to the MAM within the scope of this consultation?
MAM/MEHRS Q2	Do you have any comments on the minor changes to the MEHRS for FOC within the scope of this consultation?

Table 1 - Consultation Questions

3.2. Responses

DCC received a written response from five respondents to the 11 March 2021 consultation on the MAM and MEHRS.

4. Analysis of Responses

DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed each response.

DCC has structured the analysis of responses by question, providing an overview of the comments received and DCC's response thereto.

4.1. Changes to the Migration Authorisation Mechanism (MAM/MEHRS Q1)

DCC sought views on proposals to amend the MAM asking: "Do you have any comments on the proposed change to the MAM within the scope of this consultation?".

4.1.1. Respondents Comments

Five respondents provided a response to this question.

One respondent suggested a minor typographical amendment. DCC has amended the MAM as indicated by the respondent.

One respondent objected to the changes to the MAM regarding split-supply co-ordination as the changes didn't appropriately consider the circumstance of meters operating in prepayment mode. DCC has discussed these concerns further with the respondent to explain that it will not be possible to amend the MAM for the combination of meters operating in prepayment mode and split-supply as the process would be overly complex for such an edge case. The respondent reluctantly accepted that changes to the MAM process will be implemented by DCC as proposed by the consultation. The respondent advised DCC that they will undertake an internal assessment to explore an appropriate approach to manage their prepayment split-supply migrations.

4.1.2. Areas of Disagreement

There were no areas of disagreement with the changes proposed to the MAM through this consultation.

4.2. Changes to the Migration Error Handling and Retry Strategy (MAM/MEHRS Q2)

DCC sought views on proposals to amend the MEHRS asking: "Do you have any comments on the minor changes to the MEHRS for FOC within the scope of this consultation?".

4.2.1. Respondents Comments

Five respondents provided a response to this question.

All respondents agreed with the proposed changes.

One respondent raised a query that there was a discrepancy in clause 3.4 in that the respondent waited four hours and not five minutes for a retry up to five times and not three as stated.

5. Summary of Drafting Changes

The consultation process gave rise to a minor drafting change to the MAM as follows:

"Where supply at an installation is split across two active suppliers, the Migration Control Centre will co-ordinate the migration by designating a week in which the active suppliers submit a Migration Authorisation including any "split supply" devices. The Migration Control Centre will publish a calendar on a regular basis, which will be dependent on demand, to indicate the dates on which split supply devices should be submitted. The Migration Control Centre will not be held responsible for any devices which fail to migrate due to one supplier within the installation failing to submit details within the designated week."

The MEHRS has been updated to address the feedback from the Requesting Party for Group ID = "EA" clarifying that repeating the retry attempt in section 3.4.1 will be five times with a 4 hour waiting time.

6. Conclusions and Next Steps - MAM

DCC is confident that the version of the MAM meets the requirements set out in Clause 4.41 of the TMAD and is fit for purpose.

DCC is of the view that it has met its obligations set out in Clause 4.41 of the TMAD having consulted in line with this Clause. DCC has, where necessary, addressed the comments that have been received from industry and there are no material disputes that have not been resolved.

In terms of Clause 4.41 of TMAD, DCC intends to have the MAM come into effect on the 23 April 2021. In terms of Clause 4.42 of TMAD, in the period prior to the date on which the MAM comes into effect, any Supplier Party may object to the MAM by referring the matter to the Secretary of State, which should be sent to the following email address: Smets1_appeals@beis.gov.uk.

7. Conclusions and Next Steps - MEHRS

DCC is confident that the version of the MEHRS meets the requirements set out in Clause 8.8 of the TMAD and is fit for purpose.

DCC is of the view that it has met its obligations set out in Clause 8.8 of the TMAD having consulted in line with this Clause. In accordance with Clause 8.8 of the TMAD, DCC will publish the updated MEHRS along with the documents that have been published pursuant to that Section.

In accordance with Clause 8.9 of TMAD, within 14 days of the publication of the MEHRS, any Supplier Party may refer the MEHRS to the Secretary of State, which should be sent to the following email address: smets1_appeals@beis.gov.uk.

8. Attachments

Attachment	Title
1.	MAM V4.0 – clean
2.	MAM V4.0 - delta against current version V3.0
3.	MEHRS V5.0 – clean
4.	MEHRS V5.0 – delta against current version V4.0

Table 2 - Attachments