

Consultation on the Transition and Migration Approach Document for DCC's Service for SMETS1 Devices and accompanying changes to the SMETS1 Supporting Requirements

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1. Introduction and Context

A number of energy suppliers are installing first generation smart devices (known as SMETS1 devices) in consumers' premises across Great Britain. SMETS1 devices installed by one energy supplier, however, are not always interoperable with and supported by another supplier's systems. The Data Communications Company (DCC) has developed a plan and designed a solution for the delivery and incorporation of such devices into its national network. It provides important shared benefits for industry and consumers; particularly the ability for all SMETS1 customers to maintain their smart services following a decision to switch supplier.

Part of DCC's plan to deliver SMETS1 services involves the need to set out the approach for migrating SMETS1 Installations¹ into the DCC's systems. The detailed technical and procedural requirements of this approach are set out in the Transition and Migration Approach Document (TMAD), which is the subject of this consultation.

In summary, the TMAD seeks to set out:

- processes that must be followed by Suppliers and the DCC when migrating SMETS1 Installations that have been commissioned by an existing SMETS1 Smart Meter System Operator (SMSO), into DCC's systems; and
- specific rules or provisions that will apply for a transitional period prior to, during and/or following the migration of SMETS1 Installations.

This paper provides a summary and explanation of the principal sections of the TMAD, invites comments on the proposed TMAD drafting and asks the opinions of stakeholders on certain matters to which DCC welcomes responses. In developing the TMAD, DCC has also identified the need for further enduring changes to the SMETS1 Supporting Requirements (S1SR). The proposed additional text for inclusion in the S1SR is also provided and comments upon it are also invited.

During the various workshops with industry, DCC has shared high-level message sequence diagrams that underpin the proposed arrangements within the TMAD. As part of its continued engagement with industry, DCC intends to hold a further workshop during the consultation period with the view of providing additional support and guidance in respect of the content contained within the TMAD. It is proposed that additional supporting information and sequence diagrams are made available to industry in advance of this workshop.

2. Development, Stakeholder Engagement and Summary of Key Principles

During the development of the migration approach, DCC has engaged with stakeholders through various workshops. The feedback received from industry through these workshops

¹ Meaning a SMETS1 CHF, the SMETS1 GPF which is part of the same SMETS1 CH, the SMETS1 ESME with which the SMETS1 CHF can communicate and the set of other Devices (which may include at most one SMETS1 GSME, at most one SMETS1 PPMID, at most one SMETS1 IHD and at most one SMETS1 CAD) which are authorised to communicate over the ZigBee network to which the CHF controls access.

has been reviewed by DCC, and incorporated within the drafting of the TMAD where DCC considers it appropriate.

Through engagement with industry, DCC has observed that there may be different priorities for suppliers which have large estates of SMETS1 Meters and/or wish to play a role in the scheduling and orchestration of migration of their meters, and for suppliers who do not wish to engage with the migration process to the same extent (which may be because the only SMETS1 meters in their estate are inherited and are not being operated through the SMSO). Suppliers who do not wish to actively engage in the migration process do however expect that DCC will arrange for the migration of their devices so that they can communicate with them through the DCC service.

TMAD introduces the concept of an Active Meter (one for which the SMSO has arrangements with the Responsible Supplier to provide data and communications services) and a Dormant Meter (one for which the SMSO has no arrangements with the Responsible Supplier, but with which it is nevertheless capable of communicating). In attempting to accommodate these different supplier perspectives, DCC has sought to provide a solution that accommodates the requirements of suppliers who wish to maintain a high degree of control and also of suppliers who wish for DCC to arrange the migration of their meters, whilst delivering the migration and enrolment of meters in an efficient and effective manner. DCC considers that the proposed provisions in TMAD deliver a solution that accommodates both supplier perspectives.

In developing the approach for the migration of SMETS1 devices, DCC has built the design of the TMAD based on the following design principles, some of which have been shared and refined with stakeholders via the various transition and migration user forums:

Provision of data and execution of migration

- TMAD introduces, for the purposes of transition, a new DCC internal component. ‘the Requesting Party’ to enable DCC to enter into arrangements with SMETS1 SMSOs for the purposes of preparing data sets and executing the migration of data and SMETS1 Installations into DCC.

Commissioning of Devices other than Communications Hub Functions

- Also for the purposes of transition, TMAD introduces a further new DCC internal component ‘the Commissioning Party’ to enable DCC to carry out the commissioning of SMETS1 installations on behalf of suppliers where requested. The requirement for DCC to be capable of commissioning devices on behalf of suppliers came at the request of a significant number of Supplier Parties. Following an impact assessment and engagement with industry, DCC has concluded that this solution is best achieved through a new DCC component that generates and sends the equivalent of Service Requests using the DCC User Interface.
- It should be noted that whilst the migration approach caters for this solution, Supplier Parties will be able to alternatively choose themselves to submit commissioning related Service Requests after the migration of the data, if they wish to, although this option exists only for Active Meters. DCC intends separately to contact suppliers to request that they indicate whether they would prefer to carry out commissioning themselves, or would wish DCC to undertake the commissioning on their behalf.

Migration of Active Meters

Scheduling

- The provisions in the TMAD that relate to scheduling are intended to provide the flexibility for DCC and suppliers to plan the migration of Active Meters such that best use can be made of DCC and supplier resources. In determining when the migration of each Active Meter within a SMETS1 Installation within a capability release will take place, DCC notes that it has already engaged with Suppliers (with Active Meters that are set to be migrated into the initial capability release) on this matter, and that the publication of the TMAD will mark for most Suppliers a milestone in their migration planning. Continued engagement is expected to elicit Suppliers' preferred schedules for migration.
- Where possible, DCC will take into account the timescales that Suppliers are proposing for the migration of Active Meters for which they are responsible. In setting out a schedule, DCC will seek to ensure that is done in a manner which is non-discriminatory, and supports the migration in the most effective way. In the event of any disagreement between DCC and Suppliers on the proposed timing for migration, DCC proposes that Suppliers will have the right to refer the matter to the Secretary of State to resolve any disagreement.
- In proposing initial schedules to suppliers, DCC will in general be seeking to maximise the rate at which migration takes place. In agreeing specific schedules, DCC proposes that the following principles will apply:
 1. A SMETS1 Installation will not be included in a migration schedule without the necessary explicit or deemed consent from the relevant Responsible Supplier(s);
 2. A SMETS1 installation will not be included in a migration schedule where the Responsible Supplier for any Active Meter in that SMETS1 Installation has indicated that it wishes to carry out the necessary steps to Commission the devices comprising that SMETS1 Installation for which it is responsible, but has not yet qualified as an Eligible User for the necessary Service Requests in [End-to-End Testing – or the transitional equivalent];
 3. Any migration schedule will be such that it does not result in a rate of Migration that exceeds DCC's reasonable estimate of its systems capability to process the necessary steps to effect the Migration;
- Subject to the above, DCC proposes that the following principles will be applied by DCC in determining any schedule for Migration (recognising that in applying these principles, it will be necessary for a degree of approximation to be applied by the DCC):
 4. SMETS1 Installations comprising only Dormant Meters that have met required entry criteria will be Migrated as soon as is reasonably practicable by the DCC and in any event, the DCC shall endeavour to ensure that such SMETS1 Installations are migrated at an average rate that is not less than the average rate for Migration of SMETS1 Installations comprising one or more Active Meters within the same Group;
 5. Where possible any migration schedule should result in the Migration of SMETS1 Installations comprising Active Meters in timescales consistent with those expressed by the Responsible Supplier for each SMETS1 Installation (or, where there are two Active Meters with different responsible suppliers in the same SMETS1

Installation, the later of the timescales expressed by those two Responsible Suppliers);

6. Where it is not possible for DCC to meet the requirements of point 5 above, the DCC shall (subject to point 4 above) develop a Migration schedule that does not bring a scheduled migration prior to the requested date and that where a delay to the scheduled migration results, that DCC shall endeavour to ensure the average number of delayed hours per SMETS1 Installation for which each supplier is responsible, should be the same. Delayed hours will be determined as the sum over all relevant SMETS1 Installations of the difference between when each SMETS1 Installation actually commences Migration and when it would have done so had it been migrated in timescales consistent with those expressed by the Responsible Supplier(s) as referred to in point 5 above.

Q1

Do you agree with the principles DCC proposes to apply in agreeing the initial schedules for migration with suppliers? Please provide a rationale for your views

- In terms of advance notice for the migration, DCC proposes that Responsible Supplier(s) for each Active Meter in a SMETS1 Installation are provided with any information that is reasonably relevant to the timing of when the migration of that Active Meter will occur, at least 21 days before the migration. In order to maintain the momentum of migration and utilise but not exceed each party's capacity for migration, DCC's migration schedule may not always precisely reflect all suppliers' preferred timescales for migration. It should also be noted however that (as is described below) DCC will not commence the migration of any Active installation without an explicit authorisation from the Responsible Supplier(s).

Q2

Do you consider that a notification period of 21 days to notify the Responsible Supplier of when the migration of all Meters will occur is appropriate?

Migration Authorisation

- Before the migration of any SMETS1 Installation, for which there is one or more Active Meter, can take place, the Responsible Supplier for each Active Meter will be required to authorise the DCC to carry out the migration. Prior to the migration, the Responsible Supplier will have the responsibility to configure the SMETS1 Devices (in accordance with Clause 13 of the SMETS1 Supporting Requirements and Clause 5.1(b) of the TMAD). Whilst some Suppliers may choose to make the required configuration changes as near as possible to when the migration is actually scheduled, it should be noted that the configuration changes are a pre-requisite for those devices to be operated through DCC.
- DCC intends to obtain such Migration Authorisations via the 'Migration Authorisation Mechanism', which will be provided in a format that seeks to minimise development requirements for Responsible Suppliers i.e. via a file format that will need to be digitally signed using an IKI Private Key and transferred over the SharePoint interface. DCC will consult on the detailed Migration Authorisation Mechanism and make it available to Supplier Parties within the timeframes that are set out in the TMAD.

Migration of Dormant Meters

Scheduling

- DCC is proposing that a different approach is adopted in relation to the scheduling of Dormant Meters, which is to Migrate SMETS1 Installations which contain only Dormant Meters according to its own schedule. DCC will inform Suppliers of the relevant timing of the schedules for Dormant Meters at the time when it establishes its overarching schedule for the migration.
- The rationale for adopting a different approach in relation to the scheduling of Dormant Meters is based on the fact that:
 - Were Dormant Meters to be treated as Active Meters, issues of dispersal arise i.e. authorisations would need to be gained from Suppliers with Dormant Meters when it is DCC's understanding that some Suppliers may not want to do this; and
 - Systems changes would be needed to identify the Responsible Supplier for Dormant Meters, if DCC were to allow some Suppliers of Dormant Meters to control migration through authorisations.
- During the development of the migration approach, some industry parties have requested that DCC shares with each Responsible Supplier, in advance of the migration the Device, IDs of its Dormant Meters together with the associated MPxNs. DCC notes that changes to DCC systems changes would be required to identify the Responsible Supplier for a Dormant Meter prior to migration. In order to prevent undue costs and delays to the implementation of DCC's migration capability (as set out in the TMAD), DCC recommends that this request is not pursued at this stage.
- In terms of notifying all Suppliers in respect of Dormant Meters, DCC proposes to take reasonable steps to do so at least 21 days before carrying out steps to configure Dormant Meters and their associated Devices, and at least 21 days before carrying out steps to migrate the same Devices. This notification will not identify Device IDs, MPxNs or Responsible Suppliers and will therefore be a notification of a planned period of activity in relation to Devices operated by a particular SMETS1 SMSO. Given that the identity of SMSOs is being recorded within industry data flows,² DCC notes that the Responsible Supplier will be able to determine through that information, whether or not it has inherited any SMETS1 Devices that are being operated by a particular SMETS1 SMSO.
- Once a Dormant Meter has been migrated by DCC and Commissioned by DCC into the DCC Systems, the Responsible Supplier will receive an alert to indicate that the device has been Commissioned. The Responsible Supplier will subsequently have a choice in respect of when it decides to commence communication (which is not expected to result in any consumer impact) with the device through DCC. The device will remain in a commissioned state, and await the handover request from DCC, which the Responsible Supplier will use to provide its SMKI Organisation Certificates and those of the relevant Distribution Network Operator/Gas Transporter.

² <https://www.spaa.co.uk/SitePages/RGMA-Data-Flows/Home.aspx> (gas); <https://dtc.mrasco.com/listdataflows.aspx> (electricity)

- Where a SMETS1 Installation comprises one Active Meter and one Dormant Meter, the migration of that installation is also contingent on a Migration Authorisation being received from the Responsible Supplier for the Active Meter.

Q3 Do you agree with the proposal that that the DCC shall take reasonable steps to notify Suppliers prior to taking steps to configure and prior to taking steps to migrate Dormant Meters? Please provide a rationale for your views.

Q4 Do you consider that a notification period of at least 21 days to notify Suppliers of when the configuration of Dormant Meters will occur is appropriate? Please provide a rationale for your views.

Q5 Do you consider that a notification period of at least 21 days to notify Suppliers of when the migration of Dormant Meters will occur is appropriate? Please provide a rationale for your views.

Migration Authorisation

- In contrast to the handling of Active Meters, DCC proposes to adopt the principle of deemed consent in respect of the authorisation for migration of dormant meters, whereby consent is provided through the drafting in the TMAD itself, rather than requiring the Supplier to take any steps to provide consent. DCC further proposes that in respect of Dormant Meters, the Responsible Supplier agrees to DCC undertaking the steps that are necessary to ensure that the devices are configured as required by Clause 13 of the SMETS1 Supporting Requirements, including where necessary upgrading the firmware on that Device to ensure that the Device meets the pre-conditions for enrolment. The DCC would undertake such steps by contracting with the relevant SMSO to perform them.
- DCC's rationale for this approach is that for Dormant Meters, the Responsible Supplier has neither the firmware version nor current configuration of the Device; nor does DCC have the relevant processes in place at present that allows it to verify the identity of the Responsible Supplier for each Dormant Meter prior to its migration. An alternative, in the absence of knowing the identity of the Responsible Supplier for the Dormant Meter, is to place a requirement on DCC to require Migration Authorisations from all Suppliers for Dormant Meters prior to commencing any migration activity. DCC considers this impractical (and therefore not recommended as an approach) as failing to obtain the Migration Authorisation of one Supplier could potentially uphold the migration activity for other suppliers.
- In circumstances where the provision of the relevant firmware, which DCC (via SMETS1 SMSOs) requires to carry out the configuration activity, is unavailable, it is proposed that the Installing Supplier provides DCC with the support and assistance as is reasonably requested, including (and where this is available to that supplier), the provision of such

relevant firmware. The rationale for this proposal is that Installing suppliers, who retain significant numbers of Active Meters of one or more Device Models as the Dormant Meters referred to above, are likely to be planning for the migration of those Meters and making arrangements through established supply chains for their configuration and, where necessary, firmware upgrades. Leveraging this to support the configuration of the much smaller population of Dormant Meters provides a sensible route to migration and mitigates the risk of SMETS1 devices needing to be replaced prematurely.

Q6 Do you agree with the proposal that in respect of Dormant Meters, the TMAD deems that the Responsible Supplier has consented to DCC (via the SMETS1 SMSO) undertaking the steps that are necessary to ensure that a device is configured in such way that it complies with the SMETS1 Supporting Requirements, including upgrading the firmware on that Device to appropriately configure it (i.e. the TMAD giving DCC the authority to undertake the steps)? Please provide your rationale.

Q7 Do you agree with the proposed principle of deemed consent for Dormant Meters i.e. the TMAD giving DCC the authority to take the steps that are required for Migration? Please provide your rationale.

Q8 Do you agree with the proposal that the Installing Suppliers shall provide support and assistance as reasonably requested by DCC (including firmware where available) to support configuration of Dormant Meters by DCC? Please provide your rationale.

Migration Support

- Should problems be encountered during the migration process, DCC in its capacity as Requesting Party will (via Suppliers' relevant SMSOs) endeavour to resolve these issues and/or correct the data, where possible.

Transitional provision for Section L (Smart Metering Key Infrastructure and DCC Key Infrastructure)

- A transitional extension to the scope of Section L is being proposed to accommodate the additional Remote Party Roles (and Codes), to allow DCC to act in the capacity as either the Requesting Party or the Commissioning Party as well as providing additional Certificates to the S1SPs for use in the migration process;

Q9 Do you agree with the proposal to extend the scope of section L to provide for additional Remote Party Roles (and Codes) to allow DCC to act in the capacity as either the Requesting Party or the Commissioning Party, and to the Issuing of an

additional Certificate type for use by the S1SP in the migration processes? Please provide a rationale for your views.

Data Quality

- For Active Meters, Suppliers have contracted with SMSOs to provide the service which is reliant on the data which is provided by Energy Suppliers. Given that DCC will use and rely upon the information which is provided to it by SMETS1 SMSOs, it is proposed that DCC shall have no liability to any party should that data be found to be inaccurate.

Q10

Do you agree that DCC should not be liable where it is found that data upon which it has relied relating to a SMETS1 Installation that has been provided by a SMETS1 SMSO has been found to be inaccurate? Please provide a rationale for your views.

Planned Maintenance

- Section H8.3 of the SEC currently requires DCC to undertake Planned Maintenance of the DCC Systems only between 20.00 hours and 08.00 hours; and limit Planned Maintenance of the Self-Service Interface to no more than four hours in any month. In light of previous experience with SMETS2+, DCC considers that the enduring Planned Maintenance regime set out in H8.3 will not be appropriate to the early stages of migration. If issues become apparent, they may require the swift application of system changes. Accordingly, the DCC intends to use the existing provisions in H8.3 to request that the SEC Panel approve an amended, transitional Planned Maintenance regime for SMETS1, for the first three months of each Migration, as follows:
 - a maximum of 18 hours of Planned Maintenance per month where each Planned Maintenance slot shall not exceed 6 hours; and
 - 5 Working Days' notice will be given prior to each Planned Maintenance slot.

Q11

Do you agree with the approach that is being proposed by DCC to request Panel approval for a variation to the Planned Maintenance regime?

Other relevant documents

It should be further noted that this consultation document should be read in conjunction with the:

- proposed SMETS1 changes to the SEC Subsidiary Documents (SSDs) that have been baselined by the Technical and Business Design Group (TBDG) following consultation by the DCC. DCC plans to run a one month consultation on a second tranche of SEC Subsidiary Documents in May 2018; and
- proposed SMETS1 changes to the main sections of the SEC, which have recently been consulted on by BEIS.

Separately, DCC intends to consult in due course on the proposed approach that will demonstrate/test that the DCC systems that will be used for the migration activity work as intended via the proposed Migration Test Approach Document (MTAD). The exact timings for consulting on the MTAD will be confirmed by DCC as soon as possible.

3. High-level Summary of Proposed Rules and Obligations

The TMAD introduces a number of rights and obligations on both Suppliers and DCC to accommodate the proposed approach for migration. The following sections provide a high-level overview and explanation of what these arrangements encompass.

3.1 Transitional Variations to SEC Sections

For the purposes of Transitional Migration, it is being proposed that certain sections of the SEC are varied for the transitional period in which the TMAD rules will apply. The key principles set out in this section are:

Key Rules	Description
<p>Section A</p>	<p>Replacing (for the purposes of TMAD) the definition of “DCC Live Systems” to reflect those parts of the DCC Total System which are used for the purposes of discharging the obligations of any Requesting Party and/or Commissioning Party.</p>
	<p>Replacing (for the purposes of TMAD) the definition of “DCC Individual Live System” to reflect that part of the DCC Total System which is used by a Requesting Party and/or Commissioning Party.</p>
	<p>Replacing (for the purposes of TMAD) the definition of “Responsible Supplier” to extend its meaning to cover SMETS1 Installations.</p>
	<p>Adding the following defined terms to section A:</p> <ul style="list-style-type: none"> ▪ “Commissioning Party” and “Commissioning Party Systems”; ▪ “Requesting Party” and “Requesting Party Systems”; and ▪ “Migration”.
<p>Section F</p>	<p>To enable the identification of the SMETS1 SMSO to which an entry, against the SMETS1 Pending Product Combinations (PPC) and SMETS1 Eligible Products Combinations (EPC) lists, relates.</p> <p>To specify that no entry shall be added to the EPC list without the approval of the Secretary of State.</p>
<p>Section G</p>	<p>To reflect that:</p> <ul style="list-style-type: none"> ▪ With specific exceptions, section G does not apply in respect of the Requesting Party or the SMETS1 SMSO. Alternative security

Key Rules	Description
	<p>arrangements will apply as per the section labelled 'File Content Encryption and Decryption';</p> <ul style="list-style-type: none"> Section G applies to the Commissioning Party as it forms part of the DCC Systems.
Section H	To reflect that within 5 Working Days after the TMAD comes into effect, a User will be required to provide the DCC with an additional forecast under Section H3.22 of the number of Service Requests in respect of SMETS1 Devices that the User will send in each of the 8 months following the end of the month in which such forecast is provided.
Section L	To extend the scope of section L to incorporate additional Organisation Certificates with additional Remote Party Roles (and Codes) for the purposes of migration.
Section M	<p>To restate that, as per the provisions in Section M of the Code, neither the DCC nor the SMETS1 SMSOs shall be liable to Suppliers for any loss of data or functionality that arises from the carrying out of steps in TMAD, provided that DCC undertakes these steps in accordance with those that are set out in the TMAD.</p> <p>To reflect that SMETS1 SMSOs are entitled to rely on the relevant Section M sections i.e. waiver and release, and the third party rights, when undertaking the steps assigned to them in Clause 4 of the TMAD.</p>
Inventory Enrolment and Decommissioning Procedures (IEDP)	To reflect that the provisions of Clause 3.4 and 3.5 of the IEDP do not apply to the addition of SMETS1 Devices, that are not associated with an Enrolled SMETS1 Smart Metering System, to the Smart Metering Inventory.

Q12	Do you have any comments on the proposed drafting of section 'Transitional Variations to SEC Sections'? Please provide a rationale for your views.
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3.2 Pre-Migration Rights and Obligations

This section sets out the rights and obligations on DCC and Supplier Parties that will need to be met before initiating the migration of SMETS1 installations. The key principles set out in this section are:

Key Rules	Description
Scheduling and Pre-Conditions for Migration	These are:

Key Rules	Description
	<ul style="list-style-type: none"> ▪ general obligations on DCC and Supplier Parties to support the planning, coordination, undertaking of and ongoing support of the migration; ▪ an obligation on DCC to notify Suppliers 21 days in advance of the migration on the relevant timing of when the migration will take place. ▪ Pre-requisites that shall be met before for migration can be initiated i.e. authorisation to migration as well as SMETS1 Installations comprising Devices that correspond to an entry on the SMETS1 Eligible Product Combination; and ▪ DCC's exemption from any liability to any party where it has migrated a SMETS1 Installation (or not) as a result of the data being provided to it containing inaccuracies.
Dormant Meters	<p>These are:</p> <ul style="list-style-type: none"> ▪ consent arrangements, authorising DCC to carry out the migration of SMETS1 Installations ▪ a provision for the Responsible Supplier for a Dormant Meter to agree that the DCC undertakes the necessary steps in respect of that device for the purposes of migration; and ▪ an obligation on Installing Supplier to provide DCC with the support that may be reasonably requested to enable the DCC to initiate remote communication with a dormant device.
Migration Authorisation Mechanism	<p>This sets out the means (and timings) through which DCC shall seek to obtain the authorisation from the Responsible Supplier for migration and commissioning of SMETS1 Installations comprising an Active Meter.</p>

Q13	Do you have any comments on the proposed drafting of section 'Pre-migration Rights and Obligations'? Please provide a rationale for your views.
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3.3 Migration Process

This section sets out the processes that will need to be followed to effect the migration of SMETS1 Installations. The key principles set out in this section are:

Key Rules	Description
Setup Steps	This sets out the Cryptographic material, and where required technical configuration details, DCC is required to make available to the SMETS1 SMSO before adding an entry to the SMETS1 Eligible Product Combinations list.
Digital Signature	Setting out the valid Remote Party Roles required in Organisation Certificates used to check the Digital Signatures in each of the file types.
Counters	This sets out the counters each Requesting Party, S1SP and Commissioning Party requires to guard against replay.
Creation and Validation of Standard Information	<p>These are:</p> <ul style="list-style-type: none"> ▪ the arrangements by which the Requesting Party prepares and submits details of the SMETS1 Installations to DCC for validation; and ▪ validation rules that DCC will need to undertake in respect of the SMETS1 Installations.
Preparing to trigger Migration	Subject to securing migration authorisation, this sets out the steps that the Requesting Party will need to undertake before detailing, digitally signing and sending to the DCC, the list of SMETS1 Installations which the Requesting Party wishes to Migrate.
S1SP and DCO receipt of migration data	An obligation on DCC to share the migration data with the S1SP (and where required the DCO).
DCO processing on receipt of migration data	Setting out the sequence of checks and processing required by the DCO in the event that migration data is sent to the DCO.
S1SP processing on receipt of migration data	<p>These are:</p> <ul style="list-style-type: none"> ▪ a sequence of checks and processing required by the S1SP in the event that complete migration data is sent to the S1SP; and ▪ an obligation on S1SP to report on the outcome of those checks and processes (S1SP Commissioning File).

Q14

Do you have any comments on the proposed drafting of the section 'Migration Process'? Please provide a rationale for your views.

3.4 Commissioning Requirements

This section sets out the processes that will need to be followed to effect the commissioning of SMETS1 Devices, other than SMETS1 CHs. The key principles set out in this section are:

Key Rules	Description
Pre-Commissioning validation	This sets out the sequence of checks that the Commissioning Party has to undertake before commissioning
Commissioning of SMETS1 Installation	This sets out the relevant steps in the commissioning process that the Commissioning Party will be required to undertake in order to effect the commissioning.
Notification to Responsible Supplier of Commissioning	This requires the S1SP to issue an alert to the Responsible Supplier notify it of the successful commissioning of the device for which it is responsible.

Q15

Do you have any comments on the proposed drafting of the section 'Commissioning Requirements? Please provide a rationale for your views.

3.5 Decommissioning of a Requesting Party or the Commissioning Party

This section sets out the processes that will need to be followed to effect the decommissioning of a Requesting Party and the Commissioning Party. The key principles set out in this section can be summarised as follows:

Key Rules	Description
Requesting Party Decommissioning Timetable	This sets out the obligations on DCC to develop, consult, publish and keep up to date a timetable for the decommissioning of any Requesting Party.
Decommissioning of a Requesting Party	This sets out the obligation on DCC to following the RP Decommissioning Date for a Requesting Party to: <ul style="list-style-type: none"> submit a Certificate Revocation Request for all Organisation Certificates that have been issued to the Requesting Party/S1SP; and subsequently

Key Rules	Description
	<ul style="list-style-type: none"> destroy any cryptographic material/data associated with each such Organisation Certificate.
Decommissioning of a Commissioning Party	<p>Setting out the obligation on DCC to following the decommissioning of the last Requesting Party to:</p> <ul style="list-style-type: none"> submit a Certificate Revocation Request for all Organisation Certificates that have been issued to the Commissioning Party; and subsequently destroy any cryptographic material/data associated with each such Organisation Certificate.

Q16	Do you have any comments on the proposed drafting of the section 'Decommissioning of a Requesting Party or the Commissioning Party'? Please provide a rationale for your views.
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3.6 Technical Sections

The table below provides a high-level overview of what is set out in the technical sections of the TMAD.

Key Rules	Description
Commissioning Requests	Including the format for populating commissioning requests from the Commissioning Party as well as the validation checks for commissioning requests.
SMETS1 Migration Interface	Specifying the technical interface allowing the exchange of files between the DCC and suppliers.
SMETS1 Migration Schema	The schema against which the contents of the files that are created for the purpose of the TMAD must be validated.
File Content Encryption and Decryption	Specifying the security arrangements that shall apply between DCC/Requesting Party and SMETS1 SMSOs for the purposes of migration.
Requirement specific to GroupID = "AA"	<p>Specifying the requirements which are specific to processing in relation to SMETS1 Installations where GroupID = "AA".</p> <p>It should be noted that a Group is a set of Device Model Combinations that share common characteristics and are</p>

Key Rules	Description
	<p>treated in the same way in TMAD for the purposes of migration.</p> <p>This section in the TMAD, for GroupID "AA", is illustrative and is generally representative of the SMETS1 Installations that are relevant to the Initial Operating Capability. The TMAD will include one Group specific for each of the three Groups in the IOC release, and further Group specific sections in subsequent versions of the TMAD for other capability releases.</p>
<p>Device installation – requirements specific to GroupID = "AA"</p>	<p>Setting out the checks and processing which are required of the S1SP and DCO for the installation of a SMETS1 ESME, SMETS1 GSME and SMETS1 PPMID, for SMETS1 Installations where GroupID="AA.</p> <p>This section in the TMAD, for GroupID "AA", is illustrative and is generally representative of the SMETS1 Installations that are relevant to the Initial Operating Capability. The provisions in this section are equally relevant to the enduring DCC service and it is therefore proposed that Group specific appendices containing these provisions should be added to the SMETS1 Supporting Requirements document.</p> <p>One Group specific appendix for each of the three Groups in the IOC release will be needed, with further Group specific appendices in subsequent versions for other capability releases.</p>

Q17

Do you have any comments on the proposed drafting of the Section 'Commissioning Requests'? Please provide your rationale.

Q18

Do you have any comments on the proposed drafting of the Section 'Requirement specific to GroupID = "AA'? Please provide your rationale.

Q19

Do you have any comments on the proposed drafting of the Section 'SMETS1 Migration Interface'? Please provide your rationale.

Q20

Do you have any comments on the proposed drafting of the Section 'SMETS1 Migration Schema'? Please provide your rationale.

Q21

Do you have any comments on the proposed drafting of the Section 'File Content Encryption and Decryption'? Please provide your rationale.

Q22

Do you have any general comments on the proposed drafting of the Section 'Device installation – requirements specific to GroupID = "AA"'? Do you agree with the view that the provisions within this Section are equally relevant to the enduring DCC service, and are therefore being proposed to be added to the SMETS1 Supporting Requirements document?

4. Compiled Questions

DCC is seeking views on the following questions in regards to the SMETS1 Transition and Migration Approach Document.

Q2	Do you consider that a notification period of 21 days to notify the Responsible Supplier of when the migration of an Active Meter will occur is appropriate?
Q3	Do you agree with the proposal that that the DCC shall take reasonable steps to notify the Responsible Supplier prior to taking steps to configure and prior to taking steps to migrate Dormant Meters? Please provide a rationale for your views.
Q4	Do you consider that a notification period of at least 21 days to notify the Responsible Supplier of when the configuration of Dormant Meters will occur is appropriate? Please provide a rationale for your views.
Q5	Do you consider that a notification period of at least 21 days to notify the Responsible Supplier of when the migration of Dormant Meters will occur is appropriate? Please provide a rationale for your views.
Q6	Do you agree with the proposal that in respect of Dormant Meters, the Responsible Supplier agrees to DCC (via the SMETS1 SMSO) undertaking the steps that are necessary to ensure that a device is configured in such way that it complies with the SMETS1 supporting requirements, including upgrading the firmware on that Device? Please provide your rationale.

Q7	Do you agree with the proposed principle of deemed consent for Dormant Meters i.e. the TMAD giving DCC the authority to take the steps that are required for migration? Please provide your rationale.
Q8	Do you agree with the proposal that the Installing Suppliers shall provide support and assistance as reasonably requested by DCC (including firmware where available) to support configuration of Dormant Meters by DCC? Please provide your rationale.
Q9	Do you agree with the proposal to extend the scope of section L to provide for additional Remote Party Roles (and Codes) to allow DCC to act in the capacity as either the Requesting Party or the Commissioning Party? Please provide a rationale for your views.
Q10	Do you agree that DCC should not be liable where it is found that data upon which it has relied relating to a SMETS1 Installation that has been provided by a SMETS1 SMSO has been found to be inaccurate? Please provide a rationale for your views.
Q11	Do you agree with the approach that is being proposed by DCC to request Panel approval for a variation to the Planned Maintenance regime?
Q12	Do you have any comments on the proposed drafting of the section 'Transitional Variations to SEC Sections'? Please provide a rationale for your views.
Q13	Do you have any comments on the proposed drafting of the section 'Pre-migration Rights and Obligations'? Please provide a rationale for your views.
Q14	Do you have any comments on the proposed drafting of the section 'Migration Process'? Please provide a rationale for your views.
Q15	Do you have any comments on the proposed drafting of the section 'Decommissioning of a Requesting Party or the Commissioning Party'? Please provide a rationale for your views.
Q16	Do you have any comments on the proposed drafting of the section 'Decommissioning of a Requesting Party or the Commissioning Party'? Please provide a rationale for your views.
Q17	Do you have any comments on the Section 'Commissioning Requests'? Please provide your rationale.
Q18	Do you have any comments on the Section 'Requirement specific to GroupID = "AA'? Please provide your rationale.
Q19	Do you have any comments on the Section 'SMETS1 Migration Interface'? Please provide your rationale.

Q20	Do you have any comments on the Section 'SMETS1 Migration Schema'? Please provide your rationale.
Q21	Do you have any comments on the Section 'File Content Encryption and Decryption'? Please provide your rationale.
Q22	Do you have any general comments on the proposed drafting of the Section 'Device installation – requirements specific to GroupID = "AA"? Do you agree with the view that the provisions within this Section are equally relevant to the enduring DCC service, and are therefore being proposed to be added to the SMETS1 Supporting Requirements document?
Q23	Do you have any other comments on the proposed rights and obligations to the TMAD? Are you aware of any others issues, relating to the TMAD that should be addressed and considered?

5. Next Steps

Following the conclusion of this consultation, DCC will take into account respondents' views, and where appropriate, address the relevant comments made by parties. Provided that the document is defined to a sufficient level of detail, DCC will submit to the BEIS a copy of the TMAD, who in turn will consider whether to incorporate it into the SEC further to a consultation with SEC Parties.

It should be noted that where directed to do so by the Secretary of State, the DCC may be required develop and consult upon a further draft or drafts of the TMAD and submit it to the Secretary of State for re-designation, pursuant to Condition 22 of the DCC Licence and Section X5 of the SEC.

6. How to respond

Please provide responses in the attached template by 5 June 2018 to DCC at contact@smartdcc.co.uk.

Consultation responses may be published on our website 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). Information provided to BEIS [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 1998 and the Environmental Information Regulations 2004). If BEIS [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.

If you have any questions about the consultation documents, please contact contact@smartdcc.co.uk. If you have questions about our approach to consultations, please contact arno.vandeneinde@smartdcc.co.uk.

7. Attachments

- Attachment 1 – Transition and Migration Approach Document (TMAD); and
- Attachment 2 – Consultation Response Template