

# Conclusions on DCC's Consultation on the proposed changes to the SEC Subsidiary Documents that define DCC's SMETS1 Services



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## 1. Introduction

In the initial stages of the smart meter roll-out across Great Britain, a number of energy suppliers are installing first generation smart devices (known as SMETS1 devices) in consumers' premises. SMETS1 devices installed by one energy supplier, however, are not always interoperable with and supported by the systems used by another supplier. The Data Communications Company (DCC) has developed a plan and designed a solution for the incorporation of such devices into its national network. It provides important shared benefits for industry and consumers, and intends to offer the ability for SMETS1 consumers to maintain their smart services following a decision to switch suppliers. The next generation of smart meters (known as SMETS2 meters) will be operated via the DCC's national network from the outset and allow smart switching between suppliers as standard.

In November 2017, DCC issued a consultation on amendments of a first tranche of SEC Subsidiary Documents (SSDs) that, in conjunction with amendments to the main sections of the SEC, will define the User impacting elements of DCC's SMETS1 Services. The findings and conclusions of this consultation were shared with industry at the TBDG Enrolment and Adoption (TBDG) Sub-Group in February 2018, and they were added to the design baseline. The first tranche of SMETS1 specific changes were made against the following SSDs:

- Service Request Processing Document (SRPD);
- DCC User Interface Specification (DUIS);
- Message Mapping Catalogue (MMC);
- Inventory Enrolment and Withdrawal Procedure (IEWP);
- Organisation Certificate Policy (OCP);
- SMKI Interface Design Specification (SMKI IDS);
- CPL Requirements Document (CPL); and
- SMETS 1 Supporting Requirements (S1SR) - a new SSD documenting the requirements in relation to SMETS1 Devices.

A second tranche of SMETS1 specific amendments was consulted on by DCC during May 2018, and comprised the following SSDs:

- Incident Management Policy (IMP); and
- Self-Service Interface Design Specification (SSI DS)

This document sets out DCC's conclusions in light of the consultation feedback on second tranche of SMETS1 changes, and provides a summary of the key comments that have been raised by industry as well as DCC's responses to those comments. Where appropriate, the SSDs have been updated and revised in light of the consultation feedback as well as any outstanding issues which have previously been identified throughout engagement with industry prior to the launch of this consultation. Section 2 of this document provides an overview of the consultation comments and responses, together with a description of the

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proposed post-consultation changes to the SSDs. Marked-up and clean versions of the SSDs reflecting the totality of the changes as a result of the consultation as well as the changes are being issued alongside this document as attachments.

It should further be noted that the conclusions in respect of this consultation should be seen in conjunction with BEIS' recent consultation<sup>1</sup> on the SEC and licence changes that are required to enable provision of a SMETS1 Service by the DCC. This included a number of proposed changes to sections H8 and H9 of the SEC, which contain provisions relating to service management.

## 2. DCC Conclusions in light of Consultation Responses

Within its consultation, DCC requested that industry consider three specific questions to which in total six organisations responded. Respondent groups included three large energy suppliers, two small energy suppliers and one distribution network operator.

### 2.1 Consultation Responses and post-consultation Changes

Where appropriate, the SSDs have been updated and revised in light of the consultation comments as well as any outstanding issues which have previously been identified through engagement with industry prior to the launch of this consultation. The following sections provide an overview for each of the consultation questions, of the post-consultation changes that are being proposed, and the number and nature of respondent groups that have commented.

#### 2.1.1 Question 1

DCC asked consultees: **[Question 1]** *Do you have any comments on the proposed changes to the IMP? Please provide a rationale for your views.*

In total, 4 parties responded to Question 1 directly. Respondent groups included one large energy supplier, two small energy suppliers and one distribution network operator. An overview of the key issues raised in response to this question is summarised below.

One small energy supplier raised concerns around the potential loss of SMETS1 UTRN generation. The respective party proposed that this is mitigated through the inclusion of an additional disaster in the IMP i.e. to avoid loss of SMETS1 UTRN generation on failover to the secondary data centre and on fallback to the primary data centre. *Whilst recognising the importance of this service to industry, DCC notes that given that SMETS1 UTRNs are always generated by S1SPs, any loss will be recovered through the relevant SMETS1 disaster recovery arrangements that have been included in the IMP for S1SPs.*

One large energy supplier raised concerns around the maintenance of enrolled SMETS1 devices given that the responsibility in respect of the Communications Hub for SMETS1 sits with the lead energy supplier, as opposed to the DCC. The energy supplier in question noted that not acting upon these issues could increase the risk of devices being replaced

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<sup>1</sup> BEIS consultation on SEC changes to enable the provision of a SMETS1 service by the DCC – consultation launched on 27 March 2018 and closed on 26 April 2018.

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unnecessarily which in turn may lead to significant industry cost and consumer disruption. The respondent raised the following specific concerns and issues:

- how the non-lead supplier report an error with the communications hub? *DCC expects the non-lead supplier to take all reasonable steps to confirm that the issue does not reside within the device for which it is responsible e.g. through analysis of device logs, error alerts as well as through the use of the communications hub diagnostics service on the SSI. Subsequent to these checks, where the non-lead supplier considers that the fault may be with the communications hub, it would raise an incident with DCC. DCC would then assign the incident to the lead electricity supplier after validating that there is no error within DCC's service.*
- how will the DCC/S1SP report that there is a communications hub error rather than a DCC/S1SP error? *DCC will investigate the audit trail of the SRVs that have been sent to the Device and ensure that messages have been processed successfully through the DSP, DCO and S1SP, and determine that no issues were encountered with the SMETS1 CSP. Once this has been confirmed the incident will be re-assigned appropriately by DCC.*
- how the gas supplier would establish whether or not there is an error on the communications hub, or whether or not the fault is with the gas meter only? *DCC notes that in such scenario, it would expect the gas energy supplier to first take all reasonable steps to confirm that the issue does not reside within the gas meter e.g. through analysis of device logs, error alerts and use of the communications hub diagnostics service on SSI. Subsequent to these checks, where the gas supplier considers that the fault may be with the communications hub, it would raise an incident with DCC. DCC would then assign the incident to the lead electricity supplier after validating that there is no error within DCC's service.*
- in case of a fault with the gas meter only, how the supplier would need to register it on the HAN following replacement? *As per the case for SMETS2+, DCC expects energy suppliers to update the HAN via SRV 8.11 Update HAN.*
- whether the lead supplier would be required to have a relationship with the manufacturer of the communications hub? *It should be noted that DCC will not have any direct relationship with the manufacturer of a communications hub; however, any energy supplier that wishes to install or replace a communications hub, will be required to establish direct relationship with manufacturers.*

One small energy supplier raised concerns around disaster recovery, in particular around the potential loss of service that an energy supplier may experience upon restoration from the primary data centre. *DCC notes that as part of the existing obligations in Section H, DCC has the obligation to notify parties as soon as reasonably practicable after it becomes aware of any of any unplanned maintenance, and provide them with the information equivalent to that provided in respect of planned maintenance, including any associated risks that may subsequently affect the return of normal Services.*

*During the consultation on IMP, an additional clause 2.5.6 (d) was proposed to provide the incident party with any relevant supporting information it holds where DCC requires the incident party to diagnose to or confirm the resolution of an incident. During the consultation, however, DCC noted that irrespective of this change an incident party would have access to all the information that it requires (either via the SSI or SRVs) in order to diagnose or confirm*

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*the resolution of an incident. DCC has therefore deleted clause 2.5.6 (d) is remove from the IMP.*

Additional comments (either of a typographical nature, or requiring additional clarity) were raised in respect of the IMP, and corrected accordingly where required.

### **2.1.2 Question 2**

DCC asked consultees: **[Question 2]** *Do you have any comments on the proposed changes to the SSI DS? Please provide a rationale for your views.*

In total, 3 parties responded to Question 2. Respondent groups included one large energy supplier, one small energy supplier and one distribution network operator. A summary of the issues raised in response to this question is set out below.

One large energy supplier questioned the rationale for the retrieval of the SMETS1 Service Provider (S1SP) for SMETS1 devices, from the inventory service. *DCC notes that whilst the SMWAN coverage service on SSI will not be available in relation to SMETS1 Devices, the retrieval of the S1SP may be beneficial as it will help energy suppliers to determine the identity of the associated CSP (and therefore if needed the service availability of that CSP through coverage checking services on their public websites, where available).*

One large energy supplier noted that the proposed changes do not foresee any mechanisms to alert energy suppliers of any failures or service restrictions across CSPs. *Notwithstanding that the SMWAN coverage service will not be available for SMETS1 Devices, DCC notes that clause 5.1.9 of the IMP has been introduced as part of this consultation to ensure that DCC publishes on the SSI any information that is reasonably required in respect of affected Services in the event of any disaster.*

Given the critical nature of the UTRN service, and the need to have accurate information to manage any incidents in respect of that service, one large supplier raised concerns about the SSI not including any provision for UTRN service availability. *DCC fully recognises the importance of the UTRN service to industry, and notes that in the event of any disaster it will publish on the SSI any information that is reasonably required in respect of affected Services, including the UTRN service.*

Additional comments (either of a typographical nature, or requiring additional clarity) were raised in respect of the IMP, and corrected accordingly where required.

### **2.1.3 Question 3**

DCC asked consultees: **[Question 3]** *Do you have any other comments on the proposed changes to the SSDs? Are you aware of any others issues, relating to the SSDs that should be addressed and considered?*

No parties responded to Question 3, and therefore no further changes are proposed to the SSDs as a result of the consultation feedback to question 3.

## **3. Conclusions and Next Steps**

DCC has taken into consideration the consultation feedback, and where appropriate addressed the relevant comments made by parties. DCC considers the first tranche of SSDs to be defined to a sufficient level of detail, and to be in line with the overall solution design

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and security requirements relevant to the SMETS1 Services. On that basis, DCC intends to submit these SSDs to the TBDG Enrolment and Adoption Sub-Group and request that they are added to the design baseline so additional certainty in these elements of the design may be provided, before designating (for new SSDs) and re-designating (for existing SSDs), pursuant to Condition 22 of the DCC Licence and Section X5 of the SEC. It is envisaged that the proposed changes will be incorporated into the SEC alongside the supporting changes to the main body of SEC and licence changes, which will be developed by BEIS and consulted upon in due course. The proposed changes will be incorporated into the SEC at the appropriate point in time as determined by the Secretary of State.

In respect of further changes to DCC's SMETS1 Services, DCC previously identified that further amendments may potentially be required to support device specific processing. The timings for consulting on such changes will be confirmed by DCC in due course.

DCC (in liaison with its customers and BEIS) furthermore continues to develop documentation that will seek to set out testing<sup>2</sup> as well as transition and migration<sup>3</sup> arrangements.

It should be noted that if as a result of any of the forthcoming consultations and/or review subsequent changes (of a non-immaterial nature) are required to the SSDs post baselining, the incorporation of such changes will be managed in accordance to the TBDG Change Process.

## **4. Attachments**

The following documents are attached to this document:

- Attachment 1 – Tranche 2 SSDs Consultation Document;
- Attachment 2 – Incident Management Policy (IMP); and
- Attachment 3 – Self-Service Interface Design Specification (SSI DS);

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<sup>2</sup> Testing arrangements will be described through the SEC Variance Testing Approach Document (SVTAD) and the relevant testing approach documents i.e. User Testing Services Approach Document (UTSAD), System Capacity Testing Approach Document (SCTAD), Migration Testing Approach Document (MTAD), Enduring Test Arrangements Document (ETAD) and Common Test Scenarios Document (CTSD). The SVTAD was consulted in April 2018 and is expected to be designated in due course; timings for consulting on the testing approach documents will be confirmed by DCC in due course.

<sup>3</sup> Transition and migration arrangements will be described in the Transition and Migration Approach Document (TMAD); the TMAD consultation closed on 5 June 2018, and industry feedback is currently being analysed.