



SMETS1 Consultation TMAD - Duplicate Excluded Category

A SMETS1 consultation on amendments to the TMAD covering a correction to the duplicate Excluded Category.

Filename: SMETS1_Consultation_TMAD_Duplicates

Date: 21 April 2023

Respond by: 16:00 on 5 May 2023

Expected Conclusion date: 11 May 2023

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Classification: DCC Public

Table of Contents

1. Introduction and Context	3
2. Amendment to 'Excluded Category – Duplicate MPANs and MPRNs'	3
3. Next Steps.....	4
4. How to Respond.....	5
5. Attachments	6

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 the Migration approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD). The TMAD is Appendix AL of the Smart Energy Code¹ (SEC).

Clause 18 of the TMAD sets out a series of Excluded Categories where a solution to enable Migration is not practicable or proportionate, whether on technical, operational, or economic grounds. Any Smart Metering Systems that may be included in SMETS1 Installations, which fall within an Excluded Category, are no longer considered to be in scope for enrolment. In support of SMETS1 service delivery, in this document DCC proposes a change to the TMAD to correct an omission and improve clarity regarding 'Excluded Category - Duplicate MPANs and MPRNs'.

The inclusion of this Excluded Category within the TMAD will enable DCC to proceed with its plans for recommending to the Department for Energy Security and Net Zero (the Department) the closure of the Requesting Party service in respect of the IOC cohort, as it will enable the exclusion of approximately 2,740 SMETS1 Dormant Installations which DCC does not consider capable of successful Migration. IOC Requesting Party closure is presently planned by DCC for Sunday 28 May 2023² and is subject to the approval of the Secretary of State.

2. Amendment to 'Excluded Category - Duplicate MPANs and MPRNs'

Currently there are circumstances where 'duplicate' SMETS1 Installations arise i.e. a SMETS1 Installation is recorded as having an MPAN or MPRN (or both) that is also recorded against another SMETS1 Installation on a different SMETS1 SMSO or against an Enrolled SMS. The Excluded Category titled 'Excluded Category - Duplicate MPANs and MPRNs' within Clause 18.13 of the TMAD allows DCC to attempt Migration for the 'correct' SMETS1 Installation by excluding any 'incorrect' SMETS1 Installation. Furthermore, this Excluded Category is designed to prevent Meters being Migrated to the incorrect MPxNs as this might lead to inadvertent data access (i.e. giving the wrong Energy Supplier access to the consumer's data), which alongside being a poor outcome for the consumer would place Energy Suppliers and DCC at risk of a data protection breach.

In March 2022, the SMETS1 Various 2 Consultation³ proposed to include this Excluded Category titled 'Excluded Category - Duplicate MPANs and MPRNs' within Clause 18.13 of the TMAD, which was re-designated⁴ to include this amendment on 10 June 2022. The SMETS1 Various 2 Consultation set out that there are a range of SMETS1 Installations where the MPxNs are duplicated i.e. the MPxNs are contained within the data for more than one SMETS1 SMSO and / or are assigned to deployed SMETS2+ devices. The consultation also set out that DCC works extensively with the SMETS1 SMSOs and Responsible Suppliers to correct the data where possible to allow for the successful Migration of many such SMETS1 Installations with duplicated

¹ The current version of the SEC is available from <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>.

² See <https://www.smartdcc.co.uk/consultations/smets1-conclusion-closure-2-part-d/>

³ See <https://www.smartdcc.co.uk/consultations/smets1-consultation-various-2/> and <https://www.smartdcc.co.uk/consultations/smets1-conclusion-various-2/>

⁴ <https://smartenergycodecompany.co.uk/latest-news/sec-v60-0-implemented-to-support-the-dcc-smets1-service/>

MPxNs. DCC can confirm that it has been successful in resolving a substantial amount of data discrepancies in this area.

However, DCC's recent work in this area, including focus on the closure of the IOC cohort Requesting Party capability, has identified some shortcomings that result from the way in which the current Excluded Category is currently drafted.

First, the current Clause 18.13 (b) of the TMAD does not properly exclude SMETS1 Installations in the circumstances where another SMETS1 Installation has already been Migrated and the corresponding Enrolled SMS with the duplicate MPxN is operating on an S1SP. DCC is proposing a minor amendment to Clause 18.13 (b) to address this matter.

Second, the existing Clause 18.13 (c) makes reference to DCC verifying communication between the DCC Systems and SMSs that form part of a given SMETS1 Installation as well as determining their installation date for the application of the Excluded Category. However, DCC is not always able to determine the installation date for SMSs within SMETS1 Installations and verification of the communication is subject to interpretation (given the existing drafting in Clause 18.13 (c)). Thus, DCC is proposing an amendment to Clause 18.13 (c) to address these shortcomings by providing further clarity such that one of the following conditions need to be met for DCC to exclude a SMETS1 Installation on the grounds that it is a duplicate MPxN and at least one of the following applies:

1. there is another SMETS1 Installation that has communicated with a different SMETS1 SMSO (within the last 35 days⁵);
2. there is an SMS allocated against the same MPAN within the Smart Metering Inventory (SMI) (i.e. either SMETS2+ installed or migrated SMETS1 Installation) that has communicated with the DCC systems (within the last 35 days);
3. there is an SMS allocated against the same MPRN within the Smart Metering Inventory (SMI) (i.e. either SMETS2+ installed or migrated SMETS1 Installation) that has communicated with the DCC systems (within the 35 last days); or
4. SMSs in such SMETS1 Installations have not communicated with the SMETS1 SMSO within the last 35 days.

Amending 'Excluded Category - Duplicate MPANs and MPRNs' to address the identified shortcomings would allow the category to correctly capture an additional 11,263 SMETS1 Installations, which includes 2,740 SMETS1 Installations within the IOC cohort and for which a technical and/or operational Migration solution cannot be enabled.

Duplicate Q1

Do you support the proposal to amend the Excluded Category titled 'Excluded Category - Duplicate MPANs and MPRNs' to address the shortcomings identified by DCC? Do you have any detailed comments on the relevant changes to the legal drafting in Clauses 18.13 (b) and 18.13 (c) of the TMAD? Please provide a rationale for your views.

3. Next Steps

Following the closure of this consultation, DCC will take into account respondents' views, and, subject to the consultation responses received, submit to the Department an amended version of the TMAD that it considers suitable for re-designation by the Secretary of State.

⁵ 35 days is the standard maximum length of time during which communications of Smart Metering Systems with the DCC Systems are checked for SMETS1 purposes.

DCC aims to conclude on this consultation on 11 May 2023 and, subject to the responses received, to provide the Department with a conclusions report related to the TMAD re-designation covering the proposed amendments to be made by 17 May 2023. DCC wishes to use the amended Excluded Category to enable DCC to proceed with its plans for recommending to the Department the closure of the Requesting Party capability in respect of the IOC cohort on Sunday 28 May 2023.

Where the Secretary of State accepts the findings in DCC's conclusions report and enables the TMAD to be re-designated, the relevant SMETS1 Installations will be excluded from the scope of Migration.

DCC has discussed the re-designation of the TMAD with the Department and it is proposed that, subject to timely receipt of DCC's report, copies of relevant stakeholder responses to this consultation, and the outcome of the consultation exercise, the Secretary of State will re-designate the TMAD on 17 May 2023 or as soon as reasonably practicable within one month thereafter.

In order to expedite the re-designation of the TMAD, DCC is also seeking views on behalf of the Department on the proposed dates for re-designation of the TMAD and the relevant draft direction, which is presented in Attachment 1 of this consultation document.

Duplicate
Q1

Do you agree with the proposed re-designation date of 17 May 2023 (or within one month thereafter) for the changes to the TMAD within this consultation? Please provide a rationale for your views.

4. How to Respond

Please provide responses in the attached template by 16:00 on Friday 5 May 2023 to DCC at consultations@smartdcc.co.uk. This template may be submitted in PDF or similar format rather than Microsoft Word format if preferred.

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 Energy Security and Net Zero and the Gas and Electricity Markets Authority (the Authority). Information provided to the Department 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 2018 and the Environmental Information Regulations 2004). If the Department 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, please contact DCC via consultations@smartdcc.co.uk.

5. Attachments

Attachment / Title
1. Draft Notification Text on TMAD
2. TMAD v25.DUP Draft Redlined against V25.0 clean
3. Response Template

Table 1 - Attachments

Attachment 1

This attachment contains the text that DCC plans to use for direction of changes to the TMAD.

TMAD Draft Direction Text

This direction is made for the purposes of the smart meter communications licences granted under the Electricity Act 1989 and the Gas Act 1986 (such licences being the “DCC Licence”) and the Smart Energy Code designated by the Secretary of State pursuant to the DCC Licence (such code being the “SEC”).

Words and expressions used in this direction shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

Pursuant to Condition 22 of the DCC licence and Section X5 (Incorporation of Certain Documents into this Code) of the SEC, the Secretary of State directs that, with effect from [DD MM YYYY], the SMETS1 Transition and Migration Approach Document (TMAD) previously designated and incorporated into the SEC as Appendix AL is hereby re-designated and incorporated in the form set out in Annex [XX] to this direction.

For the avoidance of doubt such re-designation of the SMETS1 Transition and Migration Approach Document shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or the continuing effectiveness of anything done in this document prior to its re-designation (which shall have effect as if done under the re-designated document).

This direction is also being notified to the SEC Administrator.