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James Cosgrove
Deputy Director & Head of Delivery
Department for Energy Security and Net Zero (DESNZ)

By email only

4th September 2025

Dear Jim,

RE: DCC's recommendations to decommission the SMETS1 MOC (Secure) cohort following July consultation

In July 2025, DCC consulted on its proposal to decommission the MOC (Secure) cohort¹. On 4th September 2025, we published our conclusion which will be available on the DCC website. This letter sets out our recommendations on the proposal to decommission the MOC (Secure) cohort. Appendix A to this letter provides more information.

Consultation response summary

DCC consulted on a Decommissioning Date of 28th September 2025. We received eight responses to the consultation. Of those, five considered that the Draft RP Decommissioning Timetable was appropriate with three of these highlighting the cost of extending DCC's migration capability as a concern.

Another three responses considered that additional time may be required to ensure all remaining meters could be migrated. This includes those meters operated across split sites where more than one supplier needs to take action to migrate the meters. DCC is working with Supplier Parties to maximise the migrations of such meters to ensure these concerns do not materialise.

Next steps

DCC remains clear that migrations can complete in the time available and that sufficient time has been made available to have completed migrations. As such, we are now proposing that the Draft RP Decommissioning Timetable be approved by the Secretary of State. Appendix A to this letter provides more details.

DCC's submission - provided as a separate document - includes Annexes A, B, and C. Annex A sets out the Draft RP Decommissioning Timetable MOC (Secure) for SoS approval. Annexes B and C provide the updated evidence on the MOC (Secure) cohort's status for the Secretary of

¹ <https://www.smartdcc.co.uk/consultations/smets1-closure-proposal-to-close-migrations-for-moc-secure/>

State's consideration. These are confidential to DESNZ and Ofgem as they contain cost information related to the relevant SMETS1 Service Provider as well as market information related to the MOC (Secure) cohort.

Yours sincerely,

A handwritten signature in black ink, consisting of stylized, overlapping loops and a long horizontal stroke extending to the right.

Adhir Ramdarshan
Director of Regulation, DCC

Appendix A

REQUEST FOR SECRETARY OF STATE TO APPROVE THE DRAFT DECOMMISSIONING TIMETABLE FOR THE REQUESTING PARTY (RP) IN RESPECT OF THE MOC (SECURE) COHORT

DCC has the capacity to enrol all remaining meters in the MOC (Secure) cohort before the proposed draft decommissioning timetable ends. We have received verbal assurances from the main Supplier Party responsible for these meters that they intend to submit these meters for enrolment, and their most recent Migration Authorisation matches expectations based on those verbal assurances

DCC is working with all Supplier Parties operating the remaining meters to maximise split site enrolment. Where a consumer changes supplier their pre-enrolled meter may become Dormant and DCC is working to identify these meters and enrol them as they are generated and before the end of the draft decommissioning timetable.

Enrolment in MOC (Secure) is therefore expected to complete in September 2025. In line with the SMETS1 Transition and Migration Approach Document (TMAD)¹ Clause 7, DCC proposed its draft Decommissioning Timetable for the RP services in respect of MOC (Secure). Following the consultation and conclusion publication, DCC now presents it for consideration to the Secretary of State and recommends that the timetable be approved.

This recommendation is supported by evidence, which is set out in the following attachments and described in more detail below:

- **Annex A** - Draft RP Decommissioning Timetable MOC (Secure) A document produced pursuant to SMETS1 TMAD Clause 7.
- **Annex B** – Dormant Meter Status for the MOC (Secure) Cohort (**Commercially Sensitive; for the Department for Energy Security and Net Zero & OFGEM only**).
- **Annex C** - Ongoing DCC Costs to retain the RP service for the MOC (Secure) Cohort (**Commercially Sensitive; for Department for Energy Security and Net Zero & OFGEM only**).

I am writing to seek approval from the Secretary of State for the attached (Annex A) draft Decommissioning Timetable for the Requesting Party service in respect of the MOC (Secure) cohort. This includes the proposed date of Sunday 28th September for decommissioning the Requesting Party service.

As per SMETS1 TMAD Clause 7.4A, should the draft RP Decommissioning Timetable be approved, DCC will no longer take any further steps relating to SMETS1 Installations in the MOC

¹ SEC Appendix AL - SMETS1 Transition and Migration Approach Document v29.0 (smartenergycodecompany.co.uk)



(Secure) cohort, where Migration could not be commenced by the Requesting Party after expiry of the proposed decommissioning date of 28th September 2025.

This submission also includes the attached Annexes A, B, and C. These provide the updated evidence on the MOC (Secure) cohort's status for the Secretary of State's consideration. Annexes B and C are confidential to the Department for Energy Security and Net Zero (the Department) and Ofgem as they contain cost information related to the relevant SMETS1 Service Provider as well as market information related to the MOC (Secure) cohort.

The draft RP Decommissioning Timetable proposes an RP Decommissioning Date of Sunday 28th September 2025.

The following sets out the remaining steps in the regulatory process:

- Friday 5th September 2025 to 17:00 on Thursday 11th September 2025 - A five-day standstill period for any stakeholders to raise any further concerns to the Department.
- Friday 12th September 2025 – Envisaged date for the Secretary of State's decision on whether to approve the draft RP Decommissioning Timetable.
- Thursday 18th September 2025 - Final submission date for Migration Authorisations.
- W/c Monday 22nd September 2025 - Final Migration Week.
- Sunday 28th September 2025 – For the MOC (Secure) cohort, RP Decommissioned.
- No later than end October 2025 – DCC to provide each impacted RP with the relevant MPxN for any SMETS1 Smart Metering Systems comprising part of an excluded SMETS1 Installation.

This Appendix A provides statements below on key criteria, which the Department has indicated will inform its considerations on whether to approve the draft RP Decommissioning Timetable.

Closure Statement 1 (Prior Consultation)

DCC formally confirms that - between 28th July 2025 and 26th August 2025 - it consulted stakeholders on closing the RP in respect of MOC (Secure). This consultation proposed a draft Decommissioning Timetable with the Decommissioning Date on 28th September 2025.

Following the consultation, DCC's conclusion, which was submitted separately to the Department on 4th September 2025, provides an explanation of how we have consulted stakeholders. This includes confirmation that DCC's proposals relating to the draft Decommissioning Timetable and MOC (Secure) cohort closure were supported by the majority respondents to the consultation.

There were eight responses to this question.

Of these five responses supported the draft Decommissioning Timetable, of which four respondents noted that they had completed their required actions for enrolling SMETS1 meters, including those in the MOC (Secure) cohort. Three of these responses also considered that significant costs have been incurred to allow migrations to continue into 2025 where the length of



time of the DCC migration service has been extended, and they considered that the costs for providing this should not continue.

Three respondents did not agree with the proposed timetable and considered that additional time to migrate remaining meters is required.

Of those, one small supplier was concerned that the Supplier Party responsible for the majority of the cohorts pre-enrolled meters was choosing not to submit split-site Migration Authorisations. This results in the other meter at a property not being enrolled since Migration Authorisation needs to be received for each meter from each responsible supplier. DCC is working with all Supplier Parties to maximise split site enrolments, including engagement with the Supplier who has not submitted Migration Authorisations. From this engagement we understand that there is no technical reason for these meters not to be submitted for enrolment and are we expecting to receive Migration Authorisations for all meters at split sites. Furthermore, we have made Supplier Parties aware that we will be enrolling split sites every week up to the end of migrations, and have requested that they provide Migration Authorisation for all their split site meters every week, including the Supplier Party operating the most meters in the cohort.

A Meter Asset Provider did not agree with the proposed draft Decommissioning Timetable because they understood a large number of MOC (Secure) meters remained to be enrolled. We have engaged with this Party to and understand that they believed more meters were available for enrolment than there actually are, and that their numbers are slightly higher due to a lack of site of excluded meter data and a lag in their available data. They understand that DCC is working hard to maximise migrations.

Having engaged with these two Parties, we understand that their concerns will remain for so long as there remains meters available for enrolment. These Parties understand that DCC is taking all appropriate steps to encourage and maximise enrolments before the proposed RP Decommissioning Date. The majority of these meters are operated by a single Supplier Party from whom we have received assurances that remaining meters will be included in their Migration Authorisation submitted by 4th September 2025. DCC continues to work with this Supplier Party to encourage Migration Authorisation submissions, working with them to ensure the maximum number of meters available are enrolled on to DCC systems.

The Supplier Party responsible for the majority of the remaining MOC (Secure) meters in the cohort requested additional time to complete migrations. We have regular engagement with this Party and understand that they have identified two categories of issues with their remaining meters and are working through to resolution. We are receiving Migration Authorisations from this Party and understand that they will include all remaining eligible meters in at least one Migration Authorisation for migrations up to week commencing 8th September 2025. Most of these meters have previously had enrolment attempts made. We understand that their request for additional time is to manage the risk of migration failure, but we also note that there are two weeks available for additional retries once they have completed enrolment attempts by week commencing 8th September 2025. It is also true that enrolment success rates drop as more retries are attempted. This Party is aware of the time available for migrations based on the RP Decommissioning



Timetable, the costs associated with extending that timetable and the high likelihood that the RP Decommissioning Timetable will not be extended.

We have collaboratively, with this Supplier Party, the Department and Ofgem, considered if an extra week of migrations, provided at a significantly lower cost than a longer extension, could be beneficial. Due to the timing of this additional week coinciding with the 1st October 2025 tariff change event the Supplier has informed us they would not utilise the migration facility, and it is therefore not appropriate to extend the RP Decommissioning Timetable by an additional week.

We consider that enrolment can be completed before the end of the draft Decommissioning Timetable. At least one more migration attempt can be made on the remaining meters by the end of week commencing 8th September 2025, which allows two weeks for any further attempts. Where actions are taken in a timely manner the concerns of respondents regarding the remaining unmigrated meters should not materialise.

Closure Statement 2 (Migration Status)

It is DCC's view that, at the time of the proposed closure of the RP in respect of the MOC (Secure) cohort, there will be no further Installations on the SMETS1 SMSO containing solely Dormant Meters that will be in scope for Migration. As of 29th August 2025, there are 1,513 SMETS1 Installations containing Dormant Meters where all Migration attempts have not yet been exhausted, but these will be completed where all Migration attempts will have been exhausted and where such installations will have been appropriately excluded or successfully Migrated) before the proposed RP Decommissioning Date. For more details, Annex B contains further market information related to MOC (Secure).

Closure Statement 3 (Technical Readiness)

DCC can confirm that it - alongside the MOC (Secure) cohort's SMETS1 SMSO - are ready to initiate the technical closure of the RP service. This includes undertaking the steps prescribed in SMETS1 TMAD Clause 7 to promptly follow the RP Decommissioning Date. DCC is also ready to undertake the required post-closure audit activities prescribed in SMETS1 TMAD Clause 7, which requires the audit to be provided by an external service provider.

Closure Statement 4 (Economic Efficiency)

DCC confirms that it can provide justification that this approach is economic and efficient. Annex C provides the ongoing costs that DCC will incur to keep the RP service in respect of the MOC (Secure) cohort open for an additional month.

There is significant cost to extend migration capability by the month requested by the Supplier Party responsible for the majority off unenrolled meters. An additional week could be provided but the Party has informed us they would not utilise the Service due to the activities required to manage the 1st October 2025 tariff change event.

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DCC believes it is not economic or efficient to continue to incur costs beyond the proposed RP Decommissioning Date given the overall status of the MOC (Secure) cohort with only ~95,800 Active SMETS1 meters remaining on the SMETS1 SMSO in scope for migration. It is also important to note that these remaining meters are expected to have multiple enrolment attempts made before the RP Decommissioning Date. Remaining meters are expected to be either migrated or excluded from the migration path in line with the requirements set out in SMETS1 TMAD Clause 18 by the proposed RP Decommissioning Date.

There has been, and there remains to be, ample time to complete the MOC (Secure) migrations. We cannot justify committing to additional costs to further extend migrations, particularly at a time of high and rising energy costs.

Given the above, DCC considers that it is in the best interest of consumers that the MOC (Secure) cohort's RP service is closed after expiry of the proposed RP Decommissioning Date of Sunday 28th September 2025. DCC therefore recommends that the Secretary of State approves the MOC (Secure) cohort's draft RP Decommissioning Timetable.

The following annexes are provided with this letter (each provided as a separate document):

Annex	Details
Annex A	RP Decommissioning Timetable for MOC (Secure) - Draft – Version 1 Draft (DCC Public)
Annex B	Meter Status for the MOC (Secure) Cohort (DCC Confidential - Commercially Sensitive, Department for Energy Security and Net Zero & OFGEM ONLY)
Annex C	MOC (Secure) Ongoing DCC Costs to Retain SMETS1 Enrolment Services (DCC Confidential - Commercially Sensitive, Department for Energy Security and Net Zero & OFGEM ONLY)