



Consultation on regulatory changes for SMETS1 Uplift 1.2

A consultation on changes to the DCC User Interface Specification (DUIS), the SMETS1 Transition and Migration Approach Document (TMAD), the Service Request Processing Document (SRPD) and the SMETS 1 Supporting Requirements (S1SR) to support the SMETS1 Uplift 1.2

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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 the migration approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD). The current TMAD (version AL 6.0) covers requirements for the IOC, MOC (MDS), and MOC (Secure) for SMETS1 Services. Further changes to support the FOC capability are planned and there has been a separate consultation on these TMAD changes. The SMETS 1 Supporting Requirements (S1SR) describes supplementary rules for how the DCC will process SMETS1 Service Requests / Service Reference Variants (SR / SRV) and includes the accommodation of behaviours that are specific to particular SMETS1 Device Models. The DCC User Interface Specification (DUIS) provides technical details regarding the DCC's User Interface. The Service Request Processing Document (SRPD) describes how the DCC systems handle Service Requests.

The following documents are included in the Smart Energy Code¹ (SEC) as appendices:

- DUIS is Appendix AD and the latest version (3.1) was included in the SEC on 29 November 2019;
- SRPD is Appendix AB and the latest version (3.0) was included in the SEC on the 6 May 2020
- TMAD is Appendix AL and the latest version (6.0) was included in the SEC on 24 July 2020; and
- S1SR is Appendix AM and the latest version was included (4.0) in the SEC on 24 July 2020.

In April 2020, DCC concluded² on the SMETS1 Uplift 1.1 Consultation which introduced the ability for DCC to undertake SMETS1 Uplift Testing³ regarding incremental improvements to the SMETS1 arrangements as well as a number of such changes which were collectively identified as SMETS1 Uplift 1.1.

Following the successful implementation of SMETS1 Uplift 1.1 in May 2020, this consultation document is seeking views on SMETS1 Uplift 1.2 which provides a further set of incremental improvements and efficiencies to DCC SMETS1 service via changes to the relevant SEC appendices. SMETS1 Uplift 1.2 will be tested as a SMETS1 Uplift, the governance and process of which is already set out in the SMETS1 SVTAD. DCC has already engaged with the Testing Advisory Group on the scope of testing.

¹ <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>.

² <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/dcc-conclusions-on-the-smets1-uplift-11-consultation-amendments-to-the-tmad-s1sr-and-smets1-svtad/>.

³ SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) is Appendix AK of the SEC and Clause 21 of the SMETS1 SVTAD sets out the matters related to SMETS1 Uplift Testing.

On the 24 of July 2020, the DCC published a consultation on draft S1SR version 4.3 which included updates related to Secure Meter behaviour. The version of S1SR that we are including as part of this consultation is built on this version.

2. Overview of Changes within SMETS1 Uplift 1.2

Each sub-section below outlines a proposal for a distinct change to the regulatory framework.

2.1. Non-randomisation of PINs

Clause 13.1 of S1SR contains a number of pre-requisite configurations to be applied to devices prior to migration, including a requirement that the engineering menu PIN is not set to a default value e.g. 1234 (please see clause 13.1 of the SMETS1 Supporting Requirements for the specific requirement). For IOC only, this pre-requisite was incorrectly interpreted by DCC in the development of the IOC pre-migration configuration tool as a requirement to amend the existing PIN with a Pseudorandom number generator. The configuration tool is in use for both Dormant and Active IOC migrations. However, this has created an issue as the PINs were changed for certain IOC Elster gas meters when configuration was applied despite them not being default values and therefore not requiring change. Had these PINs not been erroneously changed, the value recorded by the installing engineer would align to the value of the engineering menu PIN within the meter. This is no longer the case and views have been expressed by stakeholders that this needs to be corrected by DCC providing the new PIN to the Installing Supplier, however, there is no mandate for DCC to provide the updated data to correct this error.

Thus, within Uplift 1.2, there are two matters to be addressed. First, there is a detailed software change to prevent the changing of the installing engineer's PIN to newly generated pseudorandom number during the application of configuration. This is only a software change to a configuration tool for IOC; no regulatory change to the SEC (S1SR) is required. Second, as a one-time activity (with a predetermined deadline set to be 30 working days), DCC will provide each Installing Supplier with the new engineering menu PIN for each SMETS1 Installation for those Dormant and Active EPCL entries where the PIN was incorrectly changed by the configuration process. This information is being shared with the Installing Supplier as they would have otherwise known the value of this PIN. A change to the TMAD is proposed to require DCC to provide this data to the Installing Supplier as the current custodian of the installing engineering menu PIN and to provide deemed consent for this activity permission by the Responsible Supplier.

U1.2
Q1

Do you support the proposal for DCC to provide the revised engineering menu PIN to the Installing Supplier?

Do you have any detailed comments on the relevant changes to the legal drafting?
Please provide a rationale for your views.

2.2. MPRN Validation for Leading Zeros

In some circumstances the MPRN (i.e. gas meter identifier) within certain SMETS1 SMSO systems (for IOC) are formatted as characters with leading zeros which is a slightly different specification to the main DCC system which requires an integer value e.g. 0007654321 vs 7654321. This discrepancy is preventing some SMETS1 Installations from migrating due to a failure occurring

during validation. DCC is proposing a minor change to the TMAD to permit DCC to amend the validation to account for such data misalignment such that any leading zeros are disregarded when being parsed within the validation. Whilst it could be argued that the data in each of the relevant SMETS1 SMSO systems should be amended, DCC, considers this change to be an economically efficient way to proceed in order to expedite SMETS1 Migrations.

**U1.2
Q2**

Do you support the proposal for amending the validation of MPRNs to account for leading zeros for IOC?
Do you have any detailed comments on the relevant changes to the legal drafting?
Please provide a rationale for your views.

2.3. PPMID Firmware Upgrade

DCC's is proposing to provide the capability, for IOC, MOC (MDS), and MOC (Secure) to support the update of the firmware of Prepayment Interface Devices (PPMIDs). This firmware update will be provided via expansion of existing Service Requests (11.1 Update Firmware, 11.2 Read Firmware Version, and 11.3 Activate Firmware) to allow a SMETS1 PPMID to be a valid target device. It is important to note that the implementation of this proposal will mean that DCC will be responsible for the delivery of the firmware upgrade payload to the SMETS1 PPMID; this is within the scope of a JIP milestone given Energy Supplier requirements. However, the testing and assurance of the firmware functionality and successful application of upgrade on the SMETS1 PPMID remains the responsibility of the Electricity Supplier to the premises. The proposed drafting changes are presented as redlined text against current DUIS 3.1. Subject to the outcome of this consultation DCC expects that BEIS will re-designate amended versions of both DUIS 3.0 and DUIS 3.1. Subject to the outcome of this consultation DCC also expects that BEIS will, in due course, designate DUIS 4.0 which will incorporate these changes.

U1.2 Q3

Do you support the proposal for firmware updates of SMETS1 PPMIDs?
Do you have any detailed comments on the relevant changes to the legal drafting?
Please provide a rationale for your views.

3. Legal Drafting Changes

In addition to a limited number of typographical, alignment, and formatting changes (which have been included in this consultation for transparency), there are a number of proposed changes to the TMAD, S1SR, SRPD, and DUIS (as attached). Given the number of documents that are changing and the extent of change to each is limited only changed marked versions of each document are provided. Table 1 below provides an overview of the changes. The clause references in Table 1 relate to the proposed new drafting within each document.

No	Reference	Description and Rationale for Change
1.	TMAD New Clause 3.24	New Clause permitting DCC to ignore leading zeros within the MPRN for IOC only i.e. where GroupID is "AA", "BA", or "CA".

No	Reference	Description and Rationale for Change
2.	TMAD New Clause 3.25	Requirement on DCC provide the engineering menu PIN to the Installing Supplier where the engineering menu PIN has been changed by the SMETS1 SMSO. Deemed permission from the Responsible Supplier for this activity.
3.	SRPD Changes to Clause 6.1 (n) Clause 16.1 Clause 16.2 (b) Clause 18.1 (d) (viii) (B)	Changes to support PPMID firmware upgrade capability. Corrections to align drafting to DCC system behaviour in relation to firmware upgrades. Correcting minor typographical errors.
4.	DUIS	Changes to support PPMID firmware upgrade capability. Corrections to align drafting to DCC system behaviour in relation to firmware upgrades.
5.	S1SR	Changes to support PPMID firmware upgrade capability. Corrections to align drafting to DCC system behaviour in relation to firmware upgrades. Correcting minor typographical errors.
6.	S1SR Clause 17.3	Minor change to the drafting to clarify that DMVES is provided as Annex A of the S1SR.

Table 1 - Overview of Drafting Changes

4. 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 for Business, Energy and Industrial Strategy (BEIS) an amended version of the TMAD, S1SR, SRPD, and DUIS that it considers suitable for re-designation into the SEC by the Secretary of State.

DCC is aiming to providing a conclusions report to BEIS no later than Tuesday 22 September 2020. DCC has discussed the re-designation of the TMAD, S1SR, SRPD, and DUIS with BEIS and it is proposed that, subject to timely receipt of DCC's report, copies of relevant stakeholder responses to this consultation, BEIS will re-designate the TMAD, S1SR, SRPD, and DUIS on Tuesday 29 September 2020 or as soon as reasonably practicable within one month.

In order to expedite the re-designation of the TMAD, S1SR, SRPD and DUIS, DCC is also seeking views on behalf of BEIS on the proposed dates for re-designation of the TMAD, S1SR, SRPD and DUIS as well as the draft direction which is presented in Attachment 1 of this consultation document for stakeholder consideration.

It is important to note that should readiness to deliver some of these changes slip such that some changes can be deployed at different times to others (e.g. in the circumstances that there are

elements of slippage in testing on some but not all components of the SMETS1 Uplift 1.2 package), then rather than hold up deployment of all changes until the later of them are ready and thus delay the benefits of them, DCC may propose to BEIS instead that various documents are changed at different times to each other such that individual changes set out in this consultation document are capable of going live at separate times. In such circumstances it is proposed that BEIS could re-designate different changes to the documents so long as such designations occur within the one-month period. Should any changes need to occur outside this window, then a separate consultation on the designation date(s) would be required.

U1.2
Q4

Do you agree with the proposed re-designation date for Uplift 1.2 of Tuesday 29 September 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the document set using draft notification at Attachment 1?

5. How to Respond

Please provide responses in the attached template by 1600 on Thursday 3 September 2020 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 for 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 2018 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 DCC via consultations@smartdcc.co.uk.

6. Attachments

Attachment	Title
1.	Draft Notification Text
2.	Response Template
3.	TMAD AL 6.1U - delta against current version
4.	S1SR AM 4.4 - delta against AM 4.3
5.	S1SR AM 4.4 - Annex A of the S1SR - DMVES
6.	DUIS 3.1 [Designation Date] – delta against current version
7.	SRPD AM 2.1 - delta against current version

Table 2 - Attachments

Attachment 1

This attachment contains the text that BEIS plans to use for direction of changes to the TMAD, S1SR, SRPD, and DUIS.

TMAD, S1SR, SRPD, and DUIS Draft Direction Text

This direction is made for the purposes of the smart meter communication 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 MMM YYYY], the SMETS1 Transition and Migration Approach Document previously designated and incorporated into the SEC as Appendix AL, the DCC User Interface Specification previously designated and incorporated into the SEC as Appendix AD, the Service Request Processing Document previously designated and incorporated into the SEC as Appendix AB, and the SMETS1 Supporting Requirements previously designated and incorporated into the SEC as Appendix AM are hereby re-designated and incorporated in the form set out in Annex [XX], Annex [XX], Annex [XX] (respectively) to this direction.

For the avoidance of doubt such re-designation of the SMETS1 Transition and Migration Approach Document, the DCC User Interface Specification, the Service Request Processing Document, and the SMETS1 Supporting Requirements shall be without prejudice to anything done under the DCC Licence or the SEC on or after these documents first being designated, or to the continuing effectiveness of anything done under these documents prior to their re-designation (which shall have effect as if done under the re-designated documents).

This direction is also being notified to the SEC Administrator.