

# Consultation on changes to the SMETS1 Transition and Migration Approach Document (TMAD) for MOC (MDS)

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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 this approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD). The current TMAD (which covers requirements for the initial operating capability (known as 'IOC') for SMETS1 Services) was designated by the Secretary of State on 21 June 2019 and included in the Smart Energy Code (SEC) from version 6.14 onwards as Appendix AL of the SEC.

Subsequently, there are a limited number of changes to the TMAD that are required for the Middle Operating Capability (MOC) and Final Operating Capability (FOC). The MOC release includes two cohorts of devices, a Honeywell Elster device set operated via MDS as the SMSO (henceforth referred to as MOC (MDS)), and a Secure device set operated by Secure as the SMSO (henceforth referred to as MOC (Secure)). The FOC release covers the Trilliant and Landis+Gyr device set, currently operated by three SMSOs. DCC has updated the TMAD to include changes for MOC (MDS), which is the subject of this consultation. Concurrently, DCC is also developing subsequent TMADs that covers the MOC (Secure) cohort and FOC cohort, which will be released in the near future for consultation separately. DCC considers it prudent to provide a separate TMAD consultation for each MOC cohort and FOC so that the changes can be clearly understood by those impacted.

The changes made to TMAD within the scope of this consultation against the current version in the SEC are specific to the technical requirements necessary to migrate the MOC (MDS) cohort. Specific changes are listed in Section 3 of this document. Some minor administrative changes have also been made to TMAD that provides additional clarity on the drafting and apply generally to all cohorts (including IOC). Where any change does not apply to IOC it is indicated in the changes in Section 3.

This consultation document is seeking views on the detailed changes to the TMAD as well as the date for re-designation by the Secretary of State.

**TMAD  
Q1**

*Do you have any general comments on the changes to the TMAD for MOC (MDS)?*

## 2. TMAD Changes

This version of TMAD has only a small number of MOC specific changes when compared to the IOC version. This is due to the same Honeywell Elster device set being included in IOC, meaning the only change necessary for the document has been to reflect the use of different SMSO, MDS.

The new clauses in TMAD (14.3 and 14.14) define the relationship between DCC and its service providers and does not affect DCC Users.

The migration schema for this version of TMAD has not changed as the devices are the same as those introduced in IOC, but operated by a different SMSO.

The entirety of the proposed changes to the TMAD, including those administrative changes, are set out in Figure 1 below.

**Figure 1 - Overview of TMAD Changes**

No.	TMAD Reference	Description of Change	Rationale for Change
1.	Clause 3.1A	New clause stating that SMETS1 SMSO Systems shall not be considered part of the DCC Total System.	Clarifies the position in relation to SMETS1 SMSO Systems.
2.	Clause 3.2	Delete "Withdrawal" and replace with "Decommissioning"	Aligns with name change of SEC Appendix AC
3.	Clause 3.17	Inclusion of "at the request of DCC" twice.	Clarifies that the actions carried out to enable dormant devices for migration are at the request of DCC. This change applies to IOC as well as MOC (MDS) onwards.
4.	Clause 4.2	New text "Where and to the extent notified by the DCC".	Change clarifying that Supplier Parties need to wait for confirmation from DCC that they can request early validation of the Migration Common Files (MCF).
5.	Clause 4.8 – 4.10	New text "per SMETS1 SMSO".	Clarifies that the information requested is per SMETS1 SMSO.
6.	Clause 5.1 (b) (i)	Call out to the later sub-heading in Sections 12-14 'Pre-enrolment Configuration Requirements'.	This links the GroupID specific Pre-enrolment Configuration Requirements with Section 5
7.	Clause 7.14	New clause calling out the later new sub-heading in section 14 'Post Migration Configuration'.	This clause links the Post Migration Configuration requirements introduced specifically for GroupID = "CB" for MDS (MOC) with Section 7.
8.	Section 14	Inclusion of new GroupID = "CB" for MOC MDS cohort.	Introduces the GroupID for the MOC (MDS) cohort.

No.	TMAD Reference	Description of Change	Rationale for Change
9.	Clause 14.3	“To enable Clause 14.2 for GroupID = “CB”, the DCC shall ensure that the communication service provider shall takes all reasonable steps to carry out any precursor steps that are necessary to allow the SMETS1 SMSO to configure the WAN in accordance with Clause 14.2 and provide any relevant information to the SMETS1 SMS”;	<p>This change supports the transition of the existing Subscriber Identity Module cards (SIMs) from the configuration used by the SMSO to the configuration that will be used by the S1SP post migration. This transition process will allow the existing SMSO function to continue transparently until the Migration process begins at Device level.</p> <p>Specifically, the transition will support:</p> <ul style="list-style-type: none"> <li>• Allocation of a Static IP Address for each SIM to be used post-migration</li> <li>• Transfer of the SIM IMSI value to MDS</li> <li>• Creation of a new APN for exclusive use by the DCC. Changing to the New APN removes the SIM, and the migrating Installation from the control of the SMSO.</li> </ul>
10.	Clause 14.14	New section Post Migration Configuration specific for MOC MDS. “For GroupID = “CB”, the DCC shall ensure that the communications service provider takes all reasonable steps to ensure that the SMETS1 SMSO can no longer communicate with the Commissioned SMETS1 Devices or any associated communications service provider systems.”	<p>Once the Migration process has completed, i.e. all Installations that can be migrated have been migrated, there will be a final change to the TEF systems arrangement of the SIMs.</p> <p>Those that have been successfully migrated to the DCC will be transferred to a Communications Plan that only supports the “elster” APN. This effectively removes any access by MDS against these SIMs</p> <p>Similarly, those SIMs being retained by MDS will be transferred to an MDS only Customer Account that provides MDS sole ability to control these SIMS.</p>
11.	Appendix A	Inclusion of new GroupID = “CB” for MOC MDS cohort.	Introduces the GroupID for the MOC (MDS) cohort. The process for device installation detailed within Appendix A remains unchanged from IOC.

**TMAD  
Q2**

*Do you have any detailed comments on the changes to the legal drafting in 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 of Business, Energy and Industrial Strategy (BEIS) an amended version of the TMAD that it considers suitable for re-designation into the SEC by the Secretary of State.

DCC will conclude on this consultation, providing a report to BEIS no later than 27 September 2019. DCC has discussed the re-designation of the TMAD 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 on 04 October 2019 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 BEIS on the proposed date for re-designation of the TMAD being Monday 4th October 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) as well as the draft direction which is presented in Attachment 1 of this consultation document for stakeholder consideration.

**TMAD  
Q3**

*Do you agree with the proposed re-designation date of 04 October 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the TMAD using the draft direction at Attachment 1?*

### 4. How to respond

Please provide responses in the attached template by 16:00 on Friday 06 September 2019 to DCC at [consultations@smartdcc.co.uk](mailto:consultations@smartdcc.co.uk).

Consultation responses may be published on our website [www.smartdcc.co.uk](http://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 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](mailto:consultations@smartdcc.co.uk).

### 5. Attachments

- Attachment 1 – Draft Secretary of State Direction

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- Attachment 2 – SMETS1 Transition and Migration Approach Document V1.4 (clean)
  - Attachment 3 – SMETS1 Transition and Migration Approach Document V1.4 (change marked against V1.3 i.e. current SEC text)
  - Attachment 4 - SMETS1 Migration Schema v1.0 TMAD 2.0.xsd (XML scheme)
  - Attachment 5 – Response Template

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## Attachment 1

This attachment contains the draft direction and re-designation text that BEIS intend to utilise for re-designation of the TMAD.

### **Draft Re-designation 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 [04 October 2019], the SMETS1 Transition and Migration Approach Document 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 to the continuing effectiveness of anything done under 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.*