

Consultation on regulatory changes for SMETS1 Uplift 1.1

A consultation on changes to the SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD), SMETS1 Transition and Migration Approach Document (TMAD) and SMETS 1 Supporting Requirements (S1SR) to support the SMETS1 Uplift 1.1

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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 (v1.3) covers requirements for the initial operating capability (IOC) for SMETS1 Services. Subsequently, there are a limited number of changes to the TMAD that are required for the Middle Operating Capability (MOC - Secure) and Final Operating Capability (FOC). BEIS are now consulting¹ on designating TMAD (v1.4) which provides for a small number of changes in support of MOC (MDS) and DCC is planning to conclude on the TMAD for FOC in March 2020. Further changes to support the MOC (Secure) capability are planned and there will be 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 SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) sets out the rights and obligations for a range of SMETS1 testing matters including SIT and the DMCT Process and also provides the framework for the MTAD which sets out the rights and obligations for Migration Testing.

The documents are included in the Smart Energy Code² (SEC) as appendices as follows:

- SMETS1 SVTAD is Appendix AK and the latest version was included in the SEC on 6 February 2020;
- TMAD is Appendix AL and the latest version was included in the SEC on 28 July 2019; and
- S1SR is Appendix AM and the latest version was included in the SEC on 13 December 2019.

¹ www.smartenergycodecompany.co.uk/latest-news/beis-consultation-on-re-designation-date-of-the-transition-and-migration-approach-document-to-support-the-dccs-smets1-service

² The current SEC is available via the SECAS website - www.smartenergycodecompany.co.uk/the-smart-energy-code-2/.

When reviewing these documents, it may be helpful to understand the different Group ID's used in the TMAD, as referenced in Figure 1.1:

Figure 1.1 - Overview of Drafting Changes

Group ID	Meter and CSP
AA	Itron on Vodafone
BA	Aclara on Vodafone
CA	Elster on Vodafone
CB	Elster(MDS) on Telefonica
DA	Secure Meters
EA	Trilliant/L&G (BG) on Vodafone
EB	Trilliant /L&G (NP) on Vodafone
EC	Trilliant /L&G (Trilliant as SMSO) on Vodafone

Following the delivery and initial operation of DCC's SMETS1 Initial Operating Capability, DCC identified a few changes to the TMAD and S1SR that it considers desirable to progress. These impact components across the SMETS1 solution and these are presented in this document as SMETS1 Uplift 1.1. The TMAD changes are derived from experience during SMETS1 migrations and other learnings since IOC Go Live in July 2019 and will deliver improvements to the migration process. These TMAD changes are planned to be effective for IOC and MOC (MDS) in May 2020 and DCC is planning to extend these to MOC (Secure) and FOC when those operating capabilities go live, subject to impact assessments being completed and accepted. The changes to S1SR are to record the behaviour of the S1SP when processing an SRV1.1.1. where the target device may have an external load switch and a two rate tariff has been defined. The changes to S1SR are planned to be effective to support meters migrated as part of IOC or MOC MDS from May 2020 and are not considered necessary to support the Secure or FOC cohorts. Given the incremental nature and impact of these SMETS1 Uplift 1.1 changes, an approach to testing is being specifically proposed which is designed to be proportionate to the changes under test. This approach is being proposed via amendments to the SMETS1 SVTAD.

This consultation document is seeking views on detailed amendments to the TMAD and S1SR that capture the changes within the SMETS1 Uplift 1.1 and the detailed amendments to the SMETS1 SVTAD that set out the approach to testing these changes.

2 Overview of Change

DCC is proposing changes against a number of areas and a separate consultation question is provided for each area as described in the follow sub-sections. An overview of the legal drafting changes is also provided in Section 2.5.

2.1 Auxiliary Load Tariff Schedules

DCC has become aware of a number of installations where a switch (to control heating circuits in an Economy 7 type regime and typically referred to as auxiliary load) has been deployed that is controlled by the tariff calendar on the ESME. In the absence of the change that is being proposed in this document, once migrated, the execution of an Update Tariff (SRV1.1.1) request would result in the removal of the external load switch regime and potentially the loss of heating at the site (this behaviour has been recorded in the current version of S1SR). Whilst there are commands available via current SMETS1 Smart Metering System Operators (SMSOs) to control these arrangements; these commands are not included in the SRs / SRVs that are made available via the DCC for SMETS1 devices once migrated. As a result of this, if such SMETS1 Installations are migrated and then the devices are updated with a new tariff, the secondary circuit will never be able to be either switched again or switched off permanently.

The S1SR is proposed to be amended so that, in respect of SRV1.1.1. (Update Tariff) where a Supplier requests a time of use tariff with two different rates, and where the target ESME is operating an external switch, that the schedule for the external switch is updated so that operation of the consumer's heating circuits is maintained. The precise details of how this is proposed to be implemented are set out in the proposed drafting changes to the S1SR. Where any other tariff is sent to the meter the behaviour is for the external switch to be left open (that is not operating) and no further operation of the external switch will be effected until a valid two rate time of use tariff is sent. There is also an associated change to Annex A of the S1SR (the Device Model Variations To Equivalent Steps Matrix) to align to the proposed changes to the S1SR.

This change will apply across the following meter types:

- Itron;
- Aclara; and
- Honeywell Elster.

Uplift 1.1 Q1

Do you have any views on the proposed changes to support installations where there is a switch that is controlled by the tariff calendar on the ESME? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

2.2 Removing Split Supply Validation

Currently the validation in Step 5.9.10 within Table 5.9 of the TMAD requires DCC to restrict each Migration Common File to contain only certificates from a single Supplier Party (SEC Party). This is done by identifying the SEC Party associated with the User ID of the Organisation Certificate. However, this is creating issues for certain Energy Suppliers that operate with separate SEC Party IDs for their Gas Supply business and Electricity Supply business whilst within the same corporate group. For such corporate groups the N55 Alerts may get incorrectly routed, and the Energy Supplier needs to execute SRV 6.21 to associate Organisation Certificate once DCC has commissioned on their behalf.

Given these issues, DCC is proposing to remove the validation in Step 5.9.10 with Table 5.9 of the TMAD so that both Energy Supplier's Certificates can be considered during migration in order to expedite Migrations. The alternative would be that each impacted Energy Supplier makes changes to their own business functionality which may significantly reduce the rate of SMETS1 Migrations. There are also a number of changes within the definition of Migration Authorisation and Clause 4 of the TMAD to:

- (a) allow the Responsible Supplier for the Electricity Smart Metering System, on behalf of its affiliated Responsible Supplier for the Gas Smart Metering System at the same SMETS1 Installation to:
 - a. provide a single migration authorisation that includes the Gas Smart Metering System
 - b. submit Supplier and Network Operator certificates on behalf of the Gas Supplier
 - c. indicate where it wishes the Commissioning Party to commission the devices (where either the Commissioning Party commissions all devices for the SMETS1 Installation or none at all)
- (b) enable the DCC to only notify the Responsible Supplier for the Electricity Smart Metering System where it is planning to upgrade firmware and/or reconfigure devices where both meters at the SMETS1 Installation are Dormant and both Suppliers are affiliated.

These changes also ensure there is no double counting across two Responsible Suppliers within the same corporate group with respect to forecasting and demand commitment provision. Note that for the purposes of the drafting, it has been assumed that where an affiliate relationship exist at the same Active SMETS1 Installation, that it will be the Responsible Supplier for the Electricity Smart Metering System that provides the authorisation and makes the various submissions to the DCC. These rule changes will also feed into the Migration Scaling Mechanism whereby any scaling rules will apply to the affiliates in aggregate, rather than to the individual Responsible Suppliers.

This change will apply across migration components for the following meter types:

- Itron;
- Aclara; and
- Honeywell Elster.

These changes for certificate processing for split supply are planned to be available for IOC and MOC (MDS) in May 2020 and DCC is planning to extend these to MOC (Secure) and FOC when those operating capabilities go live, subject to impact assessments being completed and accepted.

**Uplift 1.1
Q2**

Do you have any views on the proposal regarding removing the step that would not include Supplier Certificates in the processing of the Migration where the Certificates do not correspond to the same SEC Party ID and the various other changes to accommodate affiliate Responsible Suppliers? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

2.3 Improvements to Migration File Sequencing Validation

The existing migration regime includes an anti-replay measure to avoid the circumstance that the same file is processed out of sequence thereby negatively impacting the migration regime. The current approach to anti-replay is based on a simple file counter arrangement. If the file counter of a file received is less than the previous file counter, then the file will be rejected which prevents a migration. In order for the migration to proceed, currently the DCC instigates significant manual intervention.

In order to address this inefficiency within the anti-replay arrangements, DCC is proposing improvements to the file counter validation algorithm. Instead of validating that the file counter is greater than the previous file counter, the file receiver shall instead validate that the file counter has not been previously seen and / or processed. These improvements within the file counter check algorithm will ensure that the migration files that arrive out of sequence are not rejected. It should be noted that DCC considers this will improve the performance and stability of the Migration process and will also reduce the duration of Migration process.

This change will apply across migration components for the following meter types:

- Itron;
- Aclara; and
- Honeywell Elster.

These TMAD changes are planned to be available for IOC and MOC (MDS) in May 2020 and DCC is planning to extend these to MOC (Secure) and FOC when those operating capabilities go live, subject to impact assessments being completed and accepted.

**Uplift 1.1
Q3**

Do you have any views on the proposal to amend the validation algorithm for migration file sequencing? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

2.4 Gas Meter and Gas Proxy Function (GPF) Serial Number Misalignment

Currently the migration of a SMETS1 Installation is rejected in cases where the serial number for the GSME (retrieved from the GPF) does not match the serial number provided in the Migration Group File by the Requesting Party. Based on experience to date, approximately 4.2% of Itron Migrations attempted by DCC have been rejected because this step failed. This impacts a much lower percentage of Honeywell Elster meters (currently 0.01%).

Within the system design, the GSME serial number is currently relied upon by the S1SP to identify the source Device for alarms received, whereupon the S1SP will contact the GPF to read the relevant event log and clear the alarm. The GSME serial number can also be read by DCC Users using SRV 6.2.4, which returns the ManufacturerIdentifier (i.e. the Device Identifier known to the Device – usually its serial number – rather than the EUI-64 DeviceID recorded in the Smart Metering Inventory) where one is reported by the Device.

In order to maximise the migration of SMETS1 Installations and avoid the unnecessary replacement of such SMETS1 Meters, a change is proposed to the TMAD to remove the check for the following meter types:

- Itron; and
- Honeywell Elster.

There is also a need to amend the S1SP event and alert processing so that the source Device for alerts (known as push alarms) received by S1SP are identified through an alternative means that does not rely on the serial number for that Device being known by the S1SP originating from GSMEs of the following meter types:

- Itron; and
- Honeywell Elster.

For Aclara, there is no alternative means of identifying the source of alerts from GSME Devices, hence the check must continue to be carried out for this meter type.

For Secure and L&G investigation as to whether this is an issue for these meter types is ongoing.

**Uplift 1.1
Q4**

Do you have any views on the proposals to accommodate changes in the process to address misalignment between the Gas Meter Serial Number and Gas Proxy Function (GPF)? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

2.5 SMETS1 Uplift Testing

The existing provisions for testing under the SMETS1 SVTAD are based on testing related to a capability release (IOC, MOC or FOC) or the DMCT Process. However, DCC has identified that there may be changes needed to the DCC's systems related to SMETS1 to provide incremental improvement in the arrangements rather than new functionality or to support the operation of new DMCs, and the current SMETS1 SVTAD does not provide for an economic and efficient regime to tests these changes. An example of changes that require such testing are the S1SR and TMAD changes set out in this document. However, there may also be further changes required in the future to improve on the delivery of the SMETS1 Programme that are not being delivered as part of a Capability Release (IOC, MOC or FOC) or the DMCT Process.

On this basis, DCC is proposing a new regime titled 'SMETS1 Uplift Testing' which provides for DCC to develop a test approach document to cover the relevant changes. This

framework would be capable of applying to each ‘tranche’ of SMETS1 Uplift changes that are identified (the first tranche being those changes described in earlier sections of this document). A test approach document to support a tranche of SMETS1 Uplift Testing would need to be agreed between the TAG and DCC. DCC would be required to demonstrate that this testing is complete via a test completion report that will be presented to an internal TAB within DCC and then approved by the TAG. The proposals allow for disagreement between the TAG and DCC (either on the test approach document or on test completion) to be referred to the Secretary of State for determination. The arrangements also provide for each final test completion report to be published on the DCC’s website (subject to redaction if required). The proposals also provide the flexibility for User testing where required; noting that this isn’t planned to be part of Uplift 1.1. Should the DCC consider that User testing is required before a tranche of SMETS1 Uplift changes goes live, it would consult on a proposal for such testing and report to the Secretary of State on its proposal and the consultation responses. User testing would then become mandatory in accordance with proposals submitted to the Secretary of State by the DCC if so directed by the Secretary of State.

**Uplift 1.1
Q5**

Do you have any views on the proposals for SMETS1 Uplift Testing? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

2.6 Manifest Errors on the EPCL

The current TMAD doesn’t allow any errors in entries on the EPCL to be corrected. It is proposed that the TMAD is modified to allow the Secretary of State to provide for the correction of manifest errors. This drafting will provide additional clarity to the TMAD and remove any ambiguity if errors arise.

**Uplift 1.1
Q6**

Do you have any views on the proposals for correcting manifest error in relation to entries on the EPCL? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

2.7 SIM Roaming Obligation

There are some SIMs within SMETS1 communications networks that may roam across different mobile networks. It is important that as part of migration, SIMS that roam are migrated to the correct roaming account to enable this connectivity to continue. DCC proposes a minor change to the TMAD to provide an obligation on DCC to ensure that the SIM is migrated to the correct account i.e. where there are different accounts that the SIM can be migrated to, DCC will take the steps required to ensure that effective WAN communication remains in place.

**Uplift 1.1
Q7**

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

3 Document 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 SMETS1 SVTAD, the TMAD and the S1SR as set out in Figure 3.1. The clause references relate to the proposed new drafting within the SMETS1 SVTAD, the TMAD and the S1SR.

Figure 3.1 - Overview of Drafting Changes

No.	Reference	Description and Rationale for Change
1.	SMETS1 SVTAD Clause 1	New / amended definitions to support the new Clause 21 on SMETS1 Uplift Testing.
2.	SMETS1 SVTAD Clause 2, 5	Minor drafting changes to align to the new Clause 21.
3.	SMETS1 SVTAD Clause 21.1 – 21.2	Introduction to the new Clause 21 sets out the approach to SMETS1 Uplift Testing and a requirement for testing to follow Good Industry Practice.
4.	SMETS1 SVTAD Clause 21.3 – 21.6	Requirements for a SMETS1 Uplift DCC Test Approach Document to be prepared for TAG agreement (including Secretary of State referral should there be disagreement) and also provisions for the agreed document to be updated. Obligation on DCC to test as per the agreed document in line with a published plan.
5.	SMETS1 SVTAD Clause 21.7 – 21.10	If User testing is required, then a proposed SMETS1 Uplift User Testing Document will be produced covering the scope of testing (including completion). There are arrangements for consultation and submission to the Secretary of State and a right for the Secretary of State to direct Parties to undertake User Testing in accordance with that document.
6.	SMETS1 SVTAD Clause 21.11 – 21.13	Requirements for a SMETS1 Uplift DCC Testing Completion Report, the regime for approval (including Secretary of State referral) and final publication.
7.	S1SR Clause 18.1 (k) & (l)	Replacement requirement covering the auxiliary load issue.
8.	TMAD Clause 3.7	Changes to allow the Secretary of State to amend the EPCL where manifest errors have occurred.
9.	TMAD Clause 2 Clause 4 Clause 6.4	Amendment to definition of Migration Authorisation to allow a single Migration Authorisation by the Electricity Supplier to apply across an Affiliate Gas Supplier. There are also a few consequential changes within Clause 4 consistent with this requirement covering consequently changes for providing certificates for the ESME and GSME by the Electricity Supplier.

No.	Reference	Description and Rationale for Change
10.	TMAD Clause 2 Clause 5.8 Step 5.9.10 in Table 5.9	Migration Common File definition amended consistent with split supply processing requirement in Clause 5.8 and processing at Step 5.9.10 removed.
11.	TMAD Table 5.9	Steps 5.9.5 to 5.9.9 amended for the improved file sequencing algorithm.
12.	TMAD Clause 5.1 (b) (i)	Phase 'and associated steps' added to clarify processing for roaming SIMS.

4 Next Steps

There are different regimes for the approval of the TMAD and S1SR compared to the SMETS1 SVTAD as set out in the sections below.

4.1 TMAD and S1SR

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 and S1SR 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 3 April 2020. DCC is working to a plan that will deploy the changes to the DCC systems that result from the S1SR and TMAD changes outlined in this document into the production environment on 5 May 2020. DCC has discussed the re-designation of the TMAD and S1SR with BEIS and it is proposed that, subject to timely receipt of DCC's report, copies of relevant stakeholder responses to this consultation and readiness to deploy the changes to production, BEIS will re-designate the TMAD and S1SR on 5 May 2020 or as soon as reasonably practicable within one month. The draft direction text is also 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 1.1 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:

- a) the changes to the TMAD are made at a different time to the change to the S1SR; and/or
- b) the changes to the TMAD are made at different times to each other;

such that individual changes are capable of going live at separate times. In such circumstances it is proposed that BEIS could re-designate different changes to the TMAD and the change to the S1SR on different days, so long as such designations occur within

one month of 5 May 2020. Should any changes need to occur outside this window, then a separate consultation on the designation date(s) would be required.

**Uplift 1.1
Q8**

Do you agree with the proposed re-designation date of 5 May 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for each of the updates to the TMAD and the S1SR using draft notification at Attachment 1?

4.2 SMETS1 SVTAD

In terms of the SMETS1 SVTAD changes, DCC proposes to amend this itself, consistent with the provisions that allow for this in Clause 4.2 of the SMETS1 SVTAD. Accordingly, DCC will take into account respondents' views, and prepare a conclusions report for the Department of Business, Energy and Industrial Strategy (BEIS) to conclude on this consultation. The conclusions report will set out a summary of responses received and detail on how DCC have addressed any concerns raised. Unless the Secretary of State directs otherwise, DCC is proposing to amend the SMETS1 SVTAD pursuant to the provisions for it to do so within Clause 4.2 of the SMETS1 SVTAD utilising the draft notification text presented in Attachment 2 on 3 April 2020.

**Uplift 1.1
Q9**

Do you agree with the proposed amendment date of 3 April 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the SMETS1 SVTAD and the MTAD using draft notification at Attachment 2?

5 How to respond

Please provide responses in the attached template by 16:00 on Friday 13 March 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 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.

6 Attachments

- Attachment 1 – TMAD & S1SR Draft Notification Text
- Attachment 2 – SMETS1 SVTAD Draft Notification Text
- Attachment 3 - Response Template
- Attachment 4 - SMETS1 Transition and Migration Approach Document AL V1.5 (clean)
- Attachment 5 - SMETS1 Transition and Migration Approach Document AL V1.5 (change marked against redlined V1.4 – BEIS Consultation Version³)
- Attachment 6 - SMETS 1 Supporting Requirements AM V1.2 (clean)
- Attachment 7 - SMETS 1 Supporting Requirements AM V1.2 - ANNEX A - DEVICE MODEL VARIATIONS TO EQUIVALENT STEPS MATRIX (DMVES MATRIX)
- Attachment 8 - SMETS 1 Supporting Requirements AM V1.2 (change marked against V1.1)
- Attachment 9 – SEC Variation Testing Approach Document for SMETS1 Services AK V1.6 (clean)
- Attachment 10 – SEC Variation Testing Approach Document for SMETS1 Services AK V1.6 (change marked against V1.5)

³ TMAD V1.4 available from www.smartenergycodecompany.co.uk/latest-news/beis-consultation-on-re-designation-date-of-the-transition-and-migration-approach-document-to-support-the-dccs-smets1-service

Attachment 1

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

TMAD and S1SR 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 and the SMETS 1 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] and Annex [XX] (respectively) to this direction.

For the avoidance of doubt such re-designation of the SMETS1 Transition and Migration Approach Document and the SMETS 1 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.

Attachment 2

This attachment contains the text that DCC plans to use for notification of a change to the SMETS1 SVTAD.

SMETS1 SVTAD Draft Notification Text

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

Pursuant to Clause 4.2 of the SMETS1 SVTAD, DCC notifies that, with effect from [DD MMM YYYY] that the SMETS1 SVTAD is hereby modified and approved pursuant to the SMETS1 SVTAD in the form set out in Annex [AAA] of this notification.

For the avoidance of doubt such modification of the SMETS1 SVTAD shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being approved, or to the continuing effectiveness of anything done under this document prior to its modification (which shall have effect as if done under the modified documents).

This notification is also being sent to the SEC Administrator.