



SMETS1 Conclusion and Further Consultation - TMAD for FOC

**A consultation on changes to the SMETS1 Transition and
Migration Approach Document (TMAD)**

Filename: FOC_TMAD_conclude_and_reconsultation_issued

Date: 25 August 2020

Respond by: 1600 on 11 September 2020

Author: consultations@smartdcc.co.uk

Classification: DCC Public

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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 TMAD is Appendix AL of the Smart Energy Code¹ (SEC) and the latest version (AL 6.0) was included in the SEC on 24 July 2020. The current TMAD (version AL 6.0) covers requirements for the IOC, MOC (MDS), and MOC (Secure) SMETS1 Services. Currently there are also two separate consultations on other distinct changes to the TMAD:

- early firmware updates² which closes on 21 August 2020; and
- SMETS1 Uplift 1.2³ which closes on 3 September 2020.

This document covers the primary release for FOC which relates to the Trilliant and Landis+Gyr (L+G) device sets, currently operated by three SMSOs. On 18 December 2019⁴ DCC consulted on changes to make provision for FOC as well as proposed changes that were required to make provision for Change of Supplier Dormancy. This consultation closed on 22 January 2020; DCC received 6 responses which contained valuable feedback and were generally supportive of the proposed changes. On 7 May 2020, DCC published conclusions on the TMAD content relating to Change of Supplier Dormancy.⁵

This document contains conclusions in response to the FOC-specific changes proposed in the December consultation. Furthermore, due to changes to the solution for FOC, DCC has determined that further changes to TMAD are required for the primary FOC release. On this basis, this document also contains a consultation on these further changes and seeks input from industry on these proposed changes.

2. FOC Conclusion from December 2019

2.1. Regulatory Requirements

The regulatory requirement for the TMAD is set out in Section N6.4 of the SEC. The TMAD will be re-designated in terms of Section X5 of the SEC.

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

² <https://www.smartdcc.co.uk/customer-hub/consultations/smets1-early-firmware-updates/>.

³ <https://www.smartdcc.co.uk/customer-hub/consultations/consultation-on-regulatory-changes-for-smets1-uplift-12/>

⁴ <https://www.smartdcc.co.uk/customer-hub/consultations/tmad-for-foc/>

⁵ <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/dcc-consultation-response-to-the-dcc-consultation-on-changes-to-tmad-for-change-of-supplier-dormancy/>

2.2. Consultation

On 18 December 2019, DCC published the consultation for the [FOC TMAD](#) on the DCC Website. DCC's Service Desk also emailed stakeholders to notify of the publication.

Stakeholders were invited to respond by 16:00 on Wednesday 22 January 2020 in a template format that was attached to the consultation.

2.2.1. Consultation Questions

The consultation presented 3 specific questions as shown in Table 1 below.

Number	Question
TMAD for FOC Q1	Do you have any general comments on the changes to the TMAD within the scope of this consultation?
TMAD for FOC Q2	Do you have any views on DCC's proposals for minimising periods of dormancy in respect of recently dormant devices? Can you identify any other transitional opportunities that could exist to reduce the dormancy period for meters on change of supplier? Please provide a rationale for your views.
TMAD for FOC Q3	Do you have any detailed comments on the changes to the legal drafting in TMAD? Please provide a rationale for your views.

Table 1 – TMAD v1.4 Consultation Question

This section of the document is focused on conclusions to question 1 and 3 as matters related to the minimising periods of dormancy have already been concluded.

2.2.2. Responses Received

DCC received 6 responses to the consultation on the changes to the TMAD.

Each respondent's submission was provided to the Secretary of State once received by DCC consistent with the requirements set out in Section N6.4 of the SEC.

2.3. Analysis of Responses

DCC has undertaken an analysis of the feedback provided by each respondent as presented within this section of the document.

2.3.1. General Comments (Q1)

TMAD Q1: Do you have any general comments on the changes to the TMAD for FOC?

Respondent Comment	DCC Reply
<p>Respondents raised concerns about the number of consultations on the various versions of TMAD and that there is the potential that certain comments might not be addressed by DCC. There is also a general concern that changes might impact Users and could potentially impact migration timelines.</p>	<p>DCC acknowledges the concerns that have been raised by the respondents. DCC is of the opinion that focussed consultations on specific aspects of the TMAD allows for considered responses by the parties that are impacted by the consultation. This is especially relevant for the MOC (Secure) consultation that has been published in which we will be seeking responses from Energy Suppliers who are impacted by the MOC (Secure) cohort. This process also allows BEIS to designate TMAD that are specific to each cohort in the lead up to the go-live of the cohort. We carefully analyse the responses and comments that are received in response to consultations and ensure that these are all answered. In addition, DCC has provided all responses to BEIS consistent with Section N6 of the SEC.</p> <p>Of primary importance to DCC is the impact on the changes that are required to systems and processes on Energy Suppliers. DCC has taken care to obtain input from impacted Energy Suppliers and provide a solution that will be in the interest of the industry as a whole.</p>
<p>A respondent sought clarification on whether an update to the FOC Schema would be required for IOC Energy Suppliers</p>	<p>For IOC, the Schema impacts the Requesting Party, which is CGI IE for IOC and there is accordingly no impact on Energy Suppliers.</p>
<p>A respondent sought to understand how DCC would determine whether a gaining Energy Supplier is SMETS1 ready. Specifically enquiring whether any criteria would be linked to the interoperability checker for Citizen Advice Bureau.</p>	<p>Any criteria that are used by DCC in determining whether a gaining Energy Supplier is SMETS1 ready is not tied to any work being carried on the interoperability checker. DCC will be basing the criteria on the Energy Supplier having passed through eligibility testing and having adopted DUIS v3.X in the DCC production environment.</p>
<p>A respondent sought confirmation that DCC would not migrate any sites that would be classed as a Split Supply during a Change of Supplier event. The respondent raised a concern that due to the existing complexity for Split Supply, the co-ordination between the two Energy Suppliers during a Change of Supply event would result in further complications.</p>	<p>DCC does not intend to migrate any sites that are classed as "Split Supply" immediately due to a current known issue with the process. DCC is however considering how this process can be effectively managed and once this has been solved, DCC will notify industry. When a solution is in place, DCC will still refrain from migrating any Split Supply sites unless both fuels are dormant as described in the definition of "Recently Dormant SMETS1 Installation".</p>

Respondent Comment	DCC Reply
A respondent was of the opinion that DCC should consider the Prepayment enrolment journey, which should include the different operating methods for the different phases, citing where DVMES and the SMSO for the MOC (Secure) cohort define different operations for Users to follow.	We note the content of the response and will give consideration for the MOC (Secure) cohort. Due to the design of their solution there is a potential for dormant meters to be operating in prepayment mode for the Secure cohort. For all SMSOs other than the SMSO for the MOC (Secure) cohort, there should not be any dormant prepayment sites, but DCC is confirming this with each SMSO.
Respondents raised concerns that under the Master Registration Agreement (MRA) Agreed Procedure (MAP) 24, Energy Suppliers are already obligated to ensure meters are in credit mode during Change of Registration events.	The MRA requirements highlighted by the respondents to do not apply to Gas meters and it was accordingly necessary to include this content.

Table 2 – Q1 DCC Reply

2.3.2. Minimising Dormancy (Q2)

TMAD Q2: Do you have any views on DCC’s proposals for minimising periods of dormancy in respect of recently dormant devices? Can you identify any other transitional opportunities that could exist to reduce the dormancy period for meters on change of supplier? Please provide a rationale for your views.

DCC concluded on this consultation question in the minimising dormancy response on 7 May 2020.¹

2.3.3. Detailed Comments on drafting (Q3)

TMAD Q3: Do you have any detailed comments on the changes to the legal drafting in TMAD? Please provide a rationale for your views.

Respondent Comment	DCC Reply
A number of Respondents considered that Clause 15.10 should be changed, to include the words “all” before “reasonable steps” as well as to change “shall” to “must”.	DCC has amended the content of this paragraph to include “all” before “reasonable steps.” The rules of interpretation which are used by the Courts consider that “must” and “shall” are both imperative, as a result, DCC will not be changing the word “shall” as it is imperative.

¹ <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/dcc-consultation-response-to-the-dcc-consultation-on-changes-to-tmad-for-change-of-supplier-dormancy/>

Respondent Comment	DCC Reply
<p>A respondent requested clarification on part (c) of the new definition of Recently Dormant SMETS1 Installation and the need to notify suppliers of the volumes.</p>	<p>DCC agrees with the comments regarding the need to notify suppliers of the Migration volumes. Notification will be by a standard Dormant Migration file, which will include a split between the Recently Dormant from the historically dormant. This will include volumes and site information and will be done via the existing process.</p>
<p>A respondent queried Clause 5.1(c) and whether in the circumstance that DCC/S1SP is unable to establish connection to the Comms hub what the SMSO/RP would be expected/be able to do with the device set.</p>	<p>The Section is to provide for communication to be returned to the SMETS1 SMSO, TMAD drafting amended to make this clearer. TMAD has been amended to "...any certificates required to restore communication to the SMETS1 SMSO in the event of a rollback..."</p>
<p>A respondent raised a query about Table 15.6 PreviousAPN is an optional element and it is accordingly not necessarily sent in the Migration Group File. But from the validation check it seems S1SP needs this field in the file. If the supplier does not send this field [as optional], how does S1SP get this information? Our understanding is that this is being populated by DCC internally and requesting party is not required to pass this information. Please can DCC confirm?</p>	<p>After a defect resolution, the DCC Service Provider does now send the ServiceProfile details for the CHF SIM in the PreviousAPN field of the MGF. This information is required to ensure that the SIMs are rolled back to the correct locations within the DCC Service Provider's GDSP account and that communication is successfully restored to the SMSO post rollback.</p> <p>If the previousAPN field is not populated this will mean that a successful rollback will not be possible. Consequently it will fail validation as per TMAD clause 5.25, this failure step and reason will be included in the SCF file that is passed back to the relevant requesting party."</p>
<p>A respondent queried whether in the case of a validation failure with Step number 15.7.1 as mentioned in table 15.7, the requesting party receive this information and in which file this would be held?</p>	<p>This is provided for in Section 5.27 of TMAD and will be resolved using the process set out in Section 2.5.10 of the Migration Error Handling and Retry Strategy.</p>

Respondent Comment	DCC Reply
<p>A respondent queried whether in the case of a validation failure with Step number 15.6.1 as mentioned in table 15.6, the requesting party receive this information and in which file this would be held.</p>	<p>After a defect resolution, the ServiceProfile details for the CHF SIM are sent in the PreviousAPN field of the MGF. This information is required to ensure that the SIMs are rolled back to the correct locations within the GDSP account and that communication is successfully restored to the SMSO post rollback.</p> <p>If the PreviousAPN field is not populated this will mean that a successful rollback will not be possible. Consequently, it will fail validation as per TMAD clause 5.25, this failure step and reason will be included in the SCF file that is passed back to the relevant requesting party.</p>
<p>A respondent sought examples of the following statement in Clause 5.1 (ii): "...any constraints as to the use of the certificates..."</p>	<p>An example would be if a certificate was unique to a specific HES where an SMSO operated multiples HESs.</p>

Table 3 – Q3 DCC Reply

2.4. Summary of Changes to the TMAD

In light of the consultation responses received, further changes to the TMAD are presented in red, deleted text in ~~red~~ as set out in Table 4. Also in the TMAD attached to this document each change is accompanied by a comment box that states "Conclusion Change".

Clause	Drafting Change	Description and Rationale for change
4.49 (b)	that forms part of a SMETS1 Installation where GroupID = "EA" or "EB" or "EC" ;	Amended to improve clarity as Clause 4.49 only applies to the "EA" GroupID.
5.1(c)	and where GroupID = "EA" or "EB" or "EC", to receive from the relevant SMETS1 SMSO, any certificates required to restore communication to the SMETS1 SMSO in the event of a rollback along with:	Change in response to consultation comments

Clause	Drafting Change	Description and Rationale for change
Table 10.1	DeviceCertificate: As required by Appendix B of this TMAD, the digital device certificate used to establish TLS communications with the CHF Device Type encoded in Base64.	Further clarification by removing superfluous information
11.1	Except where GroupID = "EB" or "EC", a A Requesting Party shall only have access to populated EncryptedS1SPGroupInformation and EncryptedMasterKey provided by the relevant SMETS1 SMSO, and shall not have access to either the Plaintext or symmetric keys which were used as input to the population of those elements.	DCC is of the view that this change is not required as the information is the same across all cohorts.
Table 11.2.1	"AA", "BA", "CA", "CB" or "DA" , or DecryptedS1SPDPGroupInformation as required where GroupID = "EA", "EB" or "EC".	Also applies to GroupID "DA".
15.10.3	The S1SP shall take all reasonable steps to re-instate SMSO certificates on Devices.	Amended in response to consultation comments

Table 4 – Changes to the TMAD resulting from the December 2019 Consultation

Additionally, DCC has removed the proposed changes set out in Section 11.1 as DCC is of the view that these changes are superfluous. DCC has made minor changes to the Table in Clause 10 to provide further clarification.

2.5. Areas of Disagreement

DCC is of the opinion that comments related to the FOC specific changes requested clarifications. DCC has made some drafting changes in line with requests in the comments. DCC is of the opinion that there are no material areas of disagreement.

2.6. Next Steps for these conclusion

DCC expects that BEIS will re-designate the TMAD following the further consultation set out in the remainder of this document.

3. Consultation on Further Changes

This version of TMAD has a small number of FOC specific changes in the main body of the document which are in addition to the changes proposed in the 18 December 2019 consultation.

The FOC specific changes are to allow for an extended time for migrations of Active Credit and Dormant installations to complete. The extended timeline allows 192 hours (i.e. 8 days) to complete the migration of each particular FOC installation.

When the S1SP has reached the point of requesting use of details in the Migration Group Encrypted File from the DCO, as detailed in Section 5.16 of TMAD, communications with the installation will have been established and subsequent steps to complete Device Installation for each group detailed in Appendices A, B and C will be completed. The Device Installation steps are subject to a S1SP timeout which are defined for each set of GroupIDs that the S1SP operates. Systems Integration Testing has found that the FOC Communications Hub Function can take 7 days to reconnect to the SMWAN after the SIM has been migrated.

For all groups excluding Group IDs EA, EB, EC; the S1SP timeout will have expired after 48 hours, the majority of these 48 hours is an allowance for waking up the device. Clause 5.16 has been amended to allow for this additional 7 day period by making the period 192 hours i.e. 8 days. Experience gained through IOC has confirmed that 24 hours beyond the initial 7 day period will be more than sufficient time. There are also changes to Table 5.10 to account for check for any change of supply to now be a 14 day period given the 8 day migration window for FOC.

The improvements introduced for IOC related to split supply and file sequencing by Uplift 1.1¹ will not be available for the primary release of FOC and there a few changes to the TMAD to account for these differences. These changes will be reserved from the once these improves are included within the secondary release of FOC. The changes are identified in the consultation document.

The new changes set out in this section are included in the attached version of TMAD accompanied by a comment box that states: "Further Consultation Change".

FOC TMAD Q1

Do you agree with the proposed additional changes to the TMAD for FOC? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

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 that it considers suitable for re-designation into the SEC by the Secretary of State.

DCC is aiming to provide a conclusions report to BEIS no later than 9 October 2020. 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, and the outcome of the consultation exercise, BEIS will re-designate the TMAD on 7 November 2020 or as soon as reasonably practicable within one month.

¹ <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/dcc-conclusions-on-the-smets1-uplift-11-consultation-amendments-to-the-tmads1sr-and-smets1-svtad/>

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 as well as the draft direction which is presented in Attachment 1 of this consultation document for stakeholder consideration.

FOC TMAD Q2

Do you agree with the proposed re-designation date of 7 November 2020 for updates to the TMAD related to FOC (or, if necessary, as soon as reasonably practicable within one month thereafter) using draft notification at Attachment 1?

5. How to Respond

Please provide responses in the attached template by 1600 on 11 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 on TMAD for FOC
2	Response Template
3	TMAD AL 6.1F – delta against current version

Table 5 - Attachments

Attachment 1

This attachment contains the text that BEIS plans to use should it decide, having considered the outcome of the DCC consultation exercise, to direct changes to the TMAD for FOC.

TMAD 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 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.