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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) which is Appendix AL of the Smart Energy Code (SEC).

The TMAD requires that DCC develop a number of 'child' documents¹ which provide further operational and technical details. One of these documents is the Migration Scaling Methodology (MSM), which details how the daily operational constraints will be managed in the circumstance where Migration demand exceeds Migration capacity. The current version of the MSM came into effect on 20 June 2019 as Version 3.0 and is available on the DCC website².

Clauses 4.11 and 4.12 of the TMAD covers the arrangements for initial development and subsequent change of the Migration Scaling Methodology (MSM). Where DCC is proposing changes to the MSM it must consult with stakeholders. Following consultation, DCC's conclusion report and the updated version of the MSM must be published 14 days in advance of the new MSM taking effect. Also, the TMAD provides for a right of appeal to the Secretary of State within one month of publication of the updated MSM.

2. Overview

The current version of the MSM assumes a single overall capacity constraint on the DCC's entire infrastructure to provide a limit on the number of SMETS1 Installations that DCC could migrate each day. The MSM contains a two-part allocation of flat and demand weighted allocations. The flat allocation up to a threshold is set at 100 SMETS1 Installations per day. Allocation up to the threshold is granted equally across all Responsible Suppliers and intended to ensure that small Migration requests should be met in full (subject to the key constraints that are discussed further below) which will secure operational pilot phases and will also facilitate the residual Migrations activity for each Energy Supplier (i.e. intended to prevent any scale down for an Energy Supplier's final few remaining 'unmigrated' SMETS1 Installations). Under this approach, very small demand is less likely to be scaled down. It should be noted that (at the extreme) where available capacity is very low compared to aggregate demand, the minimum allocation threshold may not be available (as one or more constraints may be reached) and all Energy Suppliers will be scaled equally. The second element is demand weighted scaling for quantities over the minimum allocation threshold, again subject to the key constraints. Scaling above the threshold is an equitable allocation based on the size of Migration demand i.e. weighted by residual demand and adjusted for demand met within the flat scaling stage.

In addition to the overall constraint that is reflected in the current version of the MSM, DCC has now identified that constraints may additionally arise within the DCC system at both the S1SP and SMSO level due to the modular configuration underlying the SMETS1 solution. The relationship between these various constraints is presented in Figure 1 below.

¹ https://www.smartdcc.co.uk/document-centre/tmad-child-documents/

² https://www.smartdcc.co.uk/document-centre/tmad-child-documents/migration-scaling-methodology/

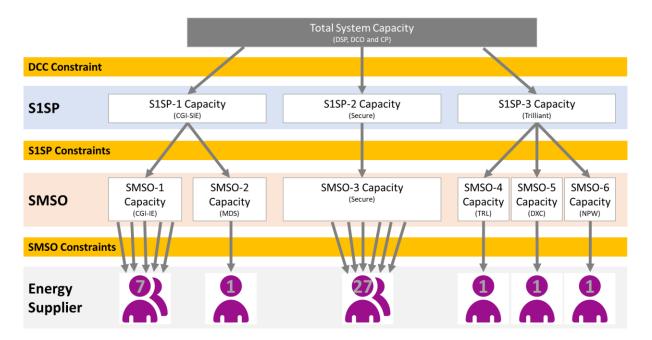


Figure 1 - Migration Service Provider Overview

Thus, DCC is now proposing further changes to the MSM; the updated algorithm proposed within the MSM takes into account the three key constraints (DCC / S1SP / SMSO). The regime is intended to ensure as much capacity as possible and thus allocations continue to each Energy Supplier until the constraints under which they sit are reached i.e. allocations would continue under S1SP-2 and S1SP-3 in the circumstance that the constraint for S1SP-1 was reach.

The changes made to MSM within the scope of this consultation are against the current version. Specific changes are listed in Section 3 of this document. Some minor administrative changes have also been proposed to the MSM that provide additional clarity on the drafting and apply generally to all cohorts as indicated in Section 3.

This consultation document is seeking views on the detailed amendments to the MSM.

3. Changes to the MSM

This version of MSM has a number of changes in the main body of the document when compared to the current version. It is also re-formatted in the revised DCC format.

The MSM will retain the current two part allocation of flat and demand weighted allocations and the key change is to introduce the two additional key constraints for each S1SP and SMSO (as described above). The key proposed changes to the MSM are set out in Table 1 below. Also, there are a few minor drafting changes within the legal drafting to amend for typographical errors and improve clarity.

No	MSM Reference	Description and Rationale for Change
1.	Section 4	Update narrative to describe the two stage algorithmic scaling subject to constraints at DCC, S1SP and SMSO. The value of D _{MIN} (used within the MSM for the flat allocation) will now be published on the DCC website from time to time. The initial value will remain at 100 SMETS1 Installations per day once DCC concludes on the MSM. This approach will allow DCC to flex this value if circumstances change.
2.	Section 5	The algorithm is now structured in a series of sub-sections.
3.	Section 5.1	Section 5.1 documents the constraints at a DCC, S1SP and SMSO level.
4.	Section 5.2	Section 5.2 provides for the circumstance where no scaling is required.
5.	Section 5.3	Section 5.3 covers the flat scaling allocation to account for the new constraints in Section 5.1
6.	Section 5.4	Section 5.4 provides the weighted allocation to account for the new constraints in Section 5.1
7.	Section 5.5	Section 5.5 determines the overall allocation based on the outcome from Section 5.3 and Section 5.4.
8.	Section 6	Updated worked examples consistent with the revised algorithm.
9.	Sections 7, 8, and 9	Please note that there are no changes to the implementation elements for the operational interfaces between each Energy Supplier and DCC set out in Sections 7, 8, and 9.

Table 1 - Overview of Drafting Changes

MSM Q1

Do you have any comments on changes to the MSM within the scope of this consultation?

4. Next Steps

Following the closure of this consultation, DCC will consider respondents' views consistent with the requirement to engage with stakeholders as per the TMAD requirements and then publish an updated MSM. DCC envisages publishing the conclusion on the MSM by 16 October 2020.

5. How to Respond

Please provide responses in the attached template by 1600 on 18 September 2020 to DCC at consultations@smartdcc.co.uk. Your response 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 1 Migration Scaling Methodology V4.0 draft (clean version)
- Attachment 2 Migration Scaling Methodology V4.0 draft (change marked against V3.0)
- Attachment 3 Response Template