



SMETS1 Conclusion and Additional Consultation TMAD for FOC

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

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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 TMAD was included in the Smart Energy Code (SEC) from version 6.14 onwards as Appendix AL of the SEC and the current version (AL 7.0) was designated by the Secretary of State on 18 September 2020.

The current TMAD covers requirements for IOC, MOC (MDS), and MOC (Secure). There are a limited number of changes to the TMAD that are required for the Final Operating Capability (FOC) covering the Trilliant and Landis+Gyr device sets, currently operated by three SMSOs. On 18 December 2019 DCC consulted on changes to the TMAD for FOC and then consulted on further changes on 25 August 2020. The version of TMAD that is attached to this document contains the changes that have been identified as a result of these consultations and the responses received.

A change to the Joint Industry Plan (JIP) has recently been approved that has delivery of two FOC releases in December 2020 and May 2021 that support the migration of device sets from two of the three SMSOs. A release to support migrations from the third (Trilliant) SMSO will be separately planned. Further changes now need to be proposed to the draft FOC TMAD to reflect adjustments to the migration solution that will be used in support of the first FOC release in December 2020, and they are contained in Section 6 of this document. DCC anticipates that further TMAD changes will also be required to support the release of additional functionality by way of a SMETS1 Uplift and/or a second FOC release in May 2021, and will consult upon such changes in due course.

In summary therefore, this document provides DCC's conclusion to the additional consultation on FOC TMAD issued on 25 August 2020 and contains a consultation on further proposed changes to TMAD to support the migration of devices for the FOC cohort under the primary release. Please note that this version of TMAD continues to support migration of the IOC, MOC (MDS), and MOC (Secure) cohorts, and hence is considered to cover devices for all cohorts.

The proposed changes to the TMAD that are published alongside these conclusions and further consultation document have been made against the current designated version (AL7.0), and contains the changes arising out of the initial consultation as well as this subsequent additional consultation. A later version of TMAD (expected to be designated as AL8.0) was submitted by the DCC to BEIS on 25 September 2020 containing changes in support of SMETS1 Uplift 1.2. However, as that version has not yet been designated and therefore is not yet in legal effect, this consultation tracks changes against AL7.0. The further changes being introduced as a result of SMETS1 Uplift 1.2 amend parts of the TMAD that are not subject to change in this FOC consultation version.

2. August 2020 Consultation

On 25 August 2020, DCC published the consultation for the FOC TMAD on the DCC Website¹. DCC's Service Desk also emailed stakeholders to notify of the publication.

Stakeholders were invited to respond by 16:00 on Friday 11 September 2020 in a template format that was attached to the consultation.

2.1. Consultation Questions

The consultation presented 2 specific questions as presented in Table 1.

Table 1 – Consultation Questions

Q Num	Question
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.
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?

2.2. Respondents

DCC received 3 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.

3. Analysis of Responses

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

3.1. Proposed changes

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.

All three respondents provided comments relating to the first question.

¹ <https://www.smartdcc.co.uk/customer-hub/consultations/smets1-conclusion-and-further-consultation-tmاد-for-foc/>

Table 2 – Consultation comments and DCC responses

Comment Received	DCC Response
A respondent queried whether Clause 4.49 related to prepayment.	DCC can confirm that the changes to Clause 4.49 relate to prepayment only.
A respondent queried the changes to Clause 5.8 and considered that they were contradictory.	DCC has amended Clause 5.8 in order to clarify the content. Please note the further changes to Clause 5.8 which are set out below. This is not reflected in the table 2 as it is the subject of further consultation.
A respondent requested that DCC include the words "or DecryptedS1SPDPGroupInformation" at the end of Clause 5.23(b).	DCC has amended Clause 5.23(b) accordingly.
A respondent raised concerns over the rules around counters that are set out in Clauses 5.9.5, 5.9.6, and 5.9.7 and that Energy Suppliers would not be able to have any input on the DCC process.	DCC acknowledges the point that has been raised by the respondent. These are internal checks within the DCC Systems and Suppliers will not have any impact on the DCC process.
A respondent sought clarification on Clause 5.9.10 relating to Split Supply as they considered that validation would fail if certificates for Split Sites were included.	The FOC primary release will support the migration of Split Supply installations (i.e. dual fuel installations with two different SEC Supplier Parties) but only where the Supplier Certificate IDs for the installations are populated with the Null Certificate ID. There are checks built in by the S1SP (step 5.9.10) to ensure that Split Supply Installations that do not satisfy this rule are not processed. Please see the proposed changes below which impacts Clause 5.9.10. This is not reflected in the table 2 as it is the subject of further consultation.
A respondent sought clarification for Clause 11.1 as it had been agreed that for Group EB they could provide plaintext.	DCC acknowledges that it has been agreed that the specific respondent can provide static text for all of their installations as the data does not change. No drafting changes are considered necessary.

<p>A respondent considered that Clause 15.3 should refer to 'EncryptedS1SPDPGroupInformation'.</p>	<p>DCC has reviewed the section and is of the opinion that the use of 'EncryptedS1SPGroupInformation' is correct in the circumstances. EncryptedS1SPGroupInformation has ProtectedData inside, and protected data includes the DecryptedS1SPDPGroupInformation structure.</p>
<p>Respondents referred to referencing errors in various sections of TMAD.</p>	<p>DCC acknowledges that there were some typographical errors in the draft version of TMAD that was published. These errors have been corrected in the version that is being published alongside this response.</p>
<p>A respondent raised a concern that was addressed in the consultation response that was published alongside this consultation relating to Clause 4.49 and the obligations in the MRA and SPAA.</p>	<p>As set out in the initial response¹, the MRA requirements highlighted by the respondents do not apply to Gas meters and it was accordingly necessary to include this content.</p>
<p>A respondent indicated that they would not always be able to set a device to credit mode if there was an issue with certificate that has prevented a top up completing successfully and therefore suggested that the "shall" in Clause 4.49(e) should be changed to 'attempt'.</p>	<p>There are no certificates related to top ups, moreover, the cryptography to change prepayment mode is proven as part of migration. Hence the supplier obligation is to change mode and is not related to top- ups. Accordingly, shall is the correct formulation.</p>
<p>A respondent queried whether the error codes in Appendix B should be used.</p>	<p>DCC can confirm that these codes are applicable to all cohorts and that Suppliers will be receiving the sub-codes defined in TMAD for all cohorts.</p>

¹ <https://www.smartdcc.co.uk/customer-hub/consultations/smets1-conclusion-and-further-consultation-tmad-for-foc/>

3.2. BEIS Designation

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?

DCC received three comments on this question. Two respondents agreed with the proposed date. One respondent did not agree on the basis that there were outstanding queries to which they sought answers. DCC is consulting on a further version of TMAD and a new designation date, which will provide the opportunity for parties to express whether their queries have been addressed.

4. Summary of Changes to the TMAD

In light of the consultation responses received, further changes to the TMAD are presented in **red** Table , deleted text in **red**.

DCC has made a minor change to Table 16.9 and 16.10 to correct referencing errors.

Table 3 – Changes to the TMAD

Clause	Drafting Change	Description and Rationale for change
5.23(b)	(b) confirm that the plaintext output from decrypting EncryptedS1SPGroupInformation is well formed and valid against the SMETS1 Migration Schema for a DecryptedS1SPGroupInformation structure or DecryptedS1SPDPGroupInformation structure as in Table 11.2.1.	Included as a result of a comment received.
Table 16.9.2.x	Where a GSMEDetail element is present, the checks and processing required for 'Installing a SMETS1 GSME' for this GroupID, as specified in Appendix C Appendix B of this TMAD, shall be undertaken.	Incorrect reference removed
Table 16.10.2.x	The checks and processing required for 'Securing a SMETS1 ESME' for this GroupID, as specified in Appendix BC of this TMAD, shall be undertaken.	Incorrect reference updated

5. Consultation on Additional Changes

DCC has identified additional changes that are required due to amendments to the migration design that have arisen as a result of the replanning activity for FOC. In order to make provision for these changes, DCC is proposing changes to TMAD as set out below.

Changes to enable Migrations to be completed successfully should certain issues be encountered

Where a migration has failed and no rollback can be attempted as communication has not been successful from the S1SP to the CHF, or where a rollback was initiated but failed, the SMSO/RP and the MCC will resubmit the migration or a list of affected migrations, where they consider as a result of doing so the migration(s) is likely to successfully complete.

The potential circumstances in which this may occur include:

- File processing error in the MEF file, for example decryption or file sequencing errors;
- File processing error in the MCF, MVF or MGF files, for example file sequencing errors;
- No communications to the CHF after the 7 day timeout has expired; and
- Communication with the CHF was successful and a subsequent migration step triggered a rollback, but a rollback step failed, e.g. re-instating SMSO certificates on Devices.

In order to successfully reattempt the migration, it is necessary for the Requesting Party to submit a new Migration Common File and then for the migration to be processed in a manner that will skip the SMSO to S1SP certificate rotation and the SIM migration steps.

This change will allow DCC to unblock migrations that have failed part way through the migration process thereby avoiding a stranded migration.

Changes relating to Split Supply Installations

The FOC primary release will support the migration of Split Supply installations (i.e. dual fuel installations with two different SEC Supplier Parties) but only where the Supplier Certificate IDs for the installations are populated with the Null Certificate ID. There are checks built in by the S1SP (step 5.9.10) to ensure that Split Supply Installations that do not satisfy this rule are not processed.

Change to Date TMAD will cease to Apply

Section 1.3 of the SEC provides that the TMAD will cease to apply on 31 December 2020. DCC notes that supplier licence conditions have been amended such that any unenrolled SMETS1 smart metering systems have to be replaced with SMETS2 smart metering systems by the end of 2021. DCC accordingly proposes changing the date that TMAD will cease to apply to be 31 December 2021.

FOCa TMAD Q1	Do you agree with the proposed additional changes to the TMAD for FOC? Please provide a rationale for your views.
FOCa TMAD Q2	Do you agree with the proposed change to the date from 31 December 2020 to 31 December 2021 that TMAD will cease to apply? Please provide a rationale for your views.

6. Legal Drafting Changes

There are a number of proposed changes to the TMAD that are set out in Table 3 below which also provides an overview of the changes. The clause references in Table 3 relate to the proposed new drafting within each document.

DCC has also changed various references that are incorrect in the current designated version.

Table 4 – Legal Drafting Changes

No	Reference	Description and Rational for Change
1	Definition	Migration Week definition amended
2	Clause 1.3	Propose change to date when TMAD will cease to Apply
3	Clause 4.15	Addition for FOC acknowledging that a migration might not complete in a day
4	Clause 4.37	Clarification
5	Clause 5.1	Changed to make provision for FOC rollback relating to certificates
6	Clause 5.8	Changes relating to Spilt Supply.
7	Clause 5.8A	New clause which makes provision for the completion of the Migration through the submission of a new Migration Common File.
7	Table 5.9.10	Amended to reflect FOC Split Supply requirements
8	Table 15.9	Various references corrected to reflect the correct Appendix
9	Appendix B	Changes to make provision for rollback

**FOCa
TMAD
Q3**

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

7. 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 is aiming to providing a report to BEIS no later than 19 November 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 and copies of relevant stakeholder responses to this consultation, BEIS will re-designate the TMAD on 13 December 2020 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 as well as the draft designation direction which is presented in Attachment 1 of this consultation document for stakeholder consideration.

8. How to Respond

Please provide responses in the attached template by 1600 on 06 November 2020 to DCC at consultations@smartdcc.co.uk.

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.

9. Attachments

- Attachment 1: TMAD Draft Direction Text
- Attachment 2: SEC Appendix AL SMETS1 TMAD 7.1 – delta
- Attachment 3: Response Template

Attachment 1

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

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.