



# **SMETS1 Consultation on changes to the SMETS1 Transition and Migration Approach Document**

**A consultation on further changes to the TMAD relating to  
the FOC Cohort.**

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**Respond by: 1600 on Friday 27 November 2020**

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**Classification: DCC Public**

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# 1. Introduction and Context

In the initial stages of the smart meter roll-out across Great Britain, a number of energy suppliers have installed first generation smart metering devices (known as SMETS1 devices), in households and small/medium non domestic premises. SMETS1 devices installed by one energy supplier, however, are not always interoperable with and supported by the systems used by another supplier. The Data Communications Company (DCC) has developed a plan and designed a solution for the incorporation of such devices into its national network. It provides important shared benefits for industry and consumers and affords the ability for SMETS1 consumers to maintain their smart services following a decision to switch suppliers.

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 8.0) was designated by the Secretary of State on 12 November 2020.

Industry agreed the JIP milestone dates for FOC go-live and DCC remains on track for the FOC Live date of 13 December 2020.

On 16 October 2020, DCC consulted<sup>1</sup> on changes to the TMAD covering a few additional matters that are required due to amendments to the migration design that have arisen as a result of the re-planning activity for the FOC cohort, which closed on 06 November 2020. DCC has now established that there are two further amendments required to the TMAD, which are the subject of this further consultation.

DCC recognises the limited timescale to provide a response to this consultation and will hold additional stakeholder engagement via the TBDG E&A sub-group on this subject within the consultation period to allow users to better understand the changes that are being proposed to the TMAD.

## 2. Changes to the TMAD

Following an internal design review prior to Go Live for FOC, an issue has become apparent that requires two amendments to the TMAD.

For FOC, the SMETS1 SMSO systems only receive and store half hourly consumption data (from ESME and GSME) pushed from the CHF when the functionality to do so is enabled on the Communications Hub. This data is collected on a daily basis and stored on a secure database within the SMETS1 SMSO. Prior to instructing the SMETS1 SMSO to enable the functionality, the Responsible Supplier is obliged to obtain the explicit consent from consumers in order to access half hourly consumption data pursuant to the requirements of the Data Access and Privacy Framework. The solution whereby half hourly consumption data pushed by the Communications Hub is stored in a database is replicated in the new S1SP functionality with half hourly consumption data only being transmitted to the S1SP where the functionality is enabled on the Communications Hub.

<sup>1</sup> <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-response-to-the-consultation-of-25-august-2020-and-further-consultation-on-tmاد-for-foc/>

DCC has identified that the S1SP solution does not have the ability to alter the settings on the Communications Hub to result in the transmission (or non-transmission) of half hourly consumption data after Migration. DCC is urgently working with service providers to address this issue and intends to implement a solution in Quarter 1 2021 to allow the functionality to be enabled or disabled post Migration. DCC will update stakeholders on its plans via IMF as per the previous updates on secondary FOC releases and uplifts.

Given this issue, DCC is now proposing two changes to the TMAD to initially restrict migration to SMETS1 Installations only where the receipt of this data by the S1SP is prevented i.e. where the "switch" for the Communications Hub in the SMETS1 Installation is set to "off" before Migration such that the data is not sent to the S1SP following Migration. This approach will ensure that the data is not stored in the S1SP database as follows:

- |                     |   |
|---------------------|---|
| Clause 4.24 & 4.24A | in DCC's case, it will work with each SMETS1 SMSO in FOC to ensure that Dormant Meters are only migrated where the switch is confirmed as being set to 'off'; and       |
| Clause 4.44B        | equally there is an obligation proposed on Active Suppliers to ensure that they only authorise the Migration of SMETS1 Installations where this switch is set to 'off'. |

Given that consumer consent is required for any transmission of half hourly consumption data, DCC proposes that the most prudent course of action is to initially Migrate only SMETS1 Installations which do not have the transmission of half hourly consumption data enabled. DCC regards this as prudent because to do otherwise would mean that the system functionality would not allow the Responsible Supplier to respond appropriately to the removal of consumer consent by way of change of tenant, change of energy supplier or express revocation. On behalf of the DCC when migrating SMETS1 Installations containing Dormant Meters, in order to identify Dormant Meters that do not have half hourly consumption data enabled, SMETS1 SMSOs will carry out a series of checks prior to migration. DCC is confident that these checks will screen out enabled devices. Responsible Suppliers for Active Meters will need to make their own equivalent arrangements with their SMETS1 SMSO. Notwithstanding this, there is a small residual risk that a SMETS1 Installation with the functionality enabled may inadvertently be Migrated. This gives rise to an "edge case" if following the erroneous Migration of a SMETS1 Installation there then is a subsequent change of tenant, change of energy supplier or express revocation of the consent in the limited period between the Migration date and the implementation of the change to the DCC solution. In the edge case, the S1SP would continue to receive half hourly consumption data after consent had expired or been revoked until the solution referenced above was implemented. However, DCC notes that in this edge case, this data would only be stored by the S1SP and not automatically provided to the Responsible Supplier.

TMAD Drafting Reference	Description
4.24 4.24A	Requirement on DCC to only migrate Dormant Meters where the switch in the Communications Hub is set to 'off' to prevent half-hourly consumption data receipt by the S1SP.
4.44B	Requirement on Responsible Supplier to only authorise the migration of Active and Mixed Meters where the switch in the Communications Hub is set to 'off' to prevent half-hourly consumption data receipt by the S1SP.

**Table 1 - Overview of TMAD Drafting Changes**

This change request invites views from stakeholders on the proposed amendments to the TMAD. In particular, DCC is inviting responses to the following consultation question:

<b>FOCb TMAD Q1</b>	Do you agree with the additional amendments to TMAD for FOC? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views?
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### 3. Next Steps

Following the closure of this consultation, DCC will take into account respondents' views, on this consultation as well as the consultation that closed on 6 November and provide and 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 report to BEIS in line with the timeframes set out in the consultation that closed on 6 November and accordingly intends to provide such report no later than 4 December 2020, so that this document can be designated to support an FOC live date of the 13 December 2020.

### 4. How to Respond

Please provide responses by 1600 on 27 November 2020 to DCC at [consultations@smartdcc.co.uk](mailto:consultations@smartdcc.co.uk) via the template provided.

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 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](mailto:consultations@smartdcc.co.uk).

## 5. Attachments

- Attachment 1: SEC Appendix AL SMETS1 TMAD 7.2 – delta vs 7.1 (NB from prior FOC consultation)
- Attachment 2: Response Template