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Table of Contents

1.	Introduction and Context	3
2.	Changes to the TMAD	3
	2.1. File Sequencing (FOC Uplift 2.0)	3
	2.2. Change to Clause 4.9 Daily Migration Demand (all SMETS1)	4
	2.3. Split Supply Migration (FOC Uplift 2.1)	4
	2.4. Prevent Push of Half Hourly Read Profile (Uplift 2.1 interim solution)	5
3.	Next Steps	12
4.	How to Respond	12
5.	Attachments	13

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 for SMETS1 are set out in the SMETS1 Transition and Migration Approach Document (TMAD). This document is included in the Smart Energy Code¹ (SEC) as Appendix AL and the latest version (9.0) was included in the SEC on 21 December 2020.

This consultation is set against the FOC TMAD <u>conclusions</u> version 11.0 which is expected to be designated on 28 February and also includes changes proposed in the Department for Business, Energy and Industrial Strategy's (BEIS) <u>Further SMETS1 TMAD consultation</u> published on 18 December 2020.

Specific proposed changes are listed in Section 2 of this document. This consultation is seeking views on the proposed detailed amendments to the TMAD.

2. Changes to the TMAD

The version of the TMAD to support FOC go-live is planned to be designated on 28 February 2021 and was published on 29 January 2021². Further changes to support the FOC migration solution are planned post FOC go-live, via two "uplifts"; Uplift 2.0 planned for March 2021 and Uplift 2.1 planned for May 2021. These proposed changes are included in this consultation. Additionally, this consultation proposes a change being introduced for all SMETS1 cohorts:

- 1. an automated file sequencing technical solution (FOC Uplift 2.0);
- 2. amendment to Clause 4.9 to clarify the default rules applying in the absence of the submission by a Supplier of its planned Migration Daily Demand in respect of a Migration Week (all SMETS1 cohorts);
- 3. changes to support the migration of Split Supply sites for the FOC cohort (FOC Uplift 2.1); and
- 4. a change to provide for a migration step to disable the pushing of half hourly profile data on the communications hub where previously enabled, together with the removal of the rules that prevent migration of communications hubs where such data pushing has previously been enabled (FOC Uplift 2.1).

These changes are set out in detail at Table 1 – Overview of Drafting Changes

2.1. File Sequencing (FOC Uplift 2.0)

Uplift 2.0 introduces a technical fix in March 2021 to bring file sequencing behaviour in line with IOC, MOC MDS and MOC Secure. Specifically, this change will enable files within the FOC

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

 $^{^2\ \}underline{\text{https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/dcc-conclusion-on-foc-tmad-and-consultation-on-redesignation-date/}$

migration solution to continue to be processed in circumstances where they are delivered out of sequence.

The technical fix to the FOC solution removes the need for a different approach to file sequencing validation for the FOC cohort. The specific changes remove validation steps added for GroupID "EA" and "EB" in table 5.9.

2.2. Change to Clause 4.9 Daily Migration Demand (all SMETS1)

Clause 4.8 (a) of the TMAD requires each energy supplier to provide to DCC, approximately 4 weeks in advance of a Migration Week, a value for its Daily Migration Demand for that Migration Week (specifically the number of SMETS1 Installations that the energy supplier is planning to migrate for each day by SMETS1 SMSO for the relevant week). Where no value is provided under Clause 4.8 (a), the existing Clause 4.9 of TMAD provides for a default value to be assumed by the DCC, with such default value being the Supplier's previous week's Daily Migration Demand submission.

However, in practice, some Suppliers do not submit a forecast Daily Migration Demand in circumstances where their planned migrations for the week are zero. The current rules thus provide an indicative demand allocation forecast that may result in demand being carried forward but not required, resulting in DCC potentially withholding capacity from customers that could utilise it. Given this matter, DCC is proposing to amend Clause 4.9 of the TMAD to set the default value to be zero where no submission is provided by an energy supplier for a Migration Week to provide for a more efficient use of capacity.

2.3. Split Supply Migration (FOC Uplift 2.1)

Currently the FOC migration solution is only able to support the migration of "split supply" SMETS1 Installations (i.e. where there are two Responsible Suppliers at the premises (one in respect of the electricity meter, and one in respect of the gas meter) if the Supplier Certificate IDs contained in the migration files used for migration have the "null value". Changes have previously been made in respect of the IOC, MOC (MDS) and MOC (Secure) migration solutions to also enable such split supplier migrations where actual Supplier Certificate IDs are used. Accompanying changes were also made to a number of provisions in Clause 4 of the TMAD to enable the electricity supplier to make various submissions to the DCC on behalf of its affiliated gas supplier and for DCC to send notifications only to the electricity supplier instead of both the electricity supplier and its affiliated gas supplier (for example, notifications by DCC in respect of planned Dormant Meter migrations and notifications by the Supplier of Supplier and/or Network Operator Certificate IDs).

These changes were introduced in the consultation for Uplift 1.1 for IOC and MOC MDS which closed on 13 March 2020³ and in the TMAD consultation for MOC Secure which closed on 3 April 2020⁴. The same changes in rules and functionality are now being proposed for the FOC cohort. This results in proposed changes to clauses 4.29, 4.30, 4.32, 4.35(c), 4.38, 4.40and the removal of a step in Table 5.9. which was previously specific to FOC group IDs, so that Energy Supplier Certificate IDs can be processed during migration.

DCC Public: Consultation on FOC TMAD for Uplift 2.0 and Uplift 2.1

³ https://www.smartdcc.co.uk/customer-hub/consultations/consultation-on-regulatory-changes-for-smets1-uplift-11/

⁴ https://www.smartdcc.co.uk/customer-hub/consultations/dcc-consultation-on-tmad-for-secure/

2.4. Prevent Push of Half Hourly Read Profile (Uplift 2.1 interim solution)

At FOC go live, reading of profile data with Service Requests 4.8.1, 4.8.2 and 4.8.3 cannot be done in a suitable way, because the current solution relies on communication hubs pushing meter data for storage in the S1SP database irrespective of whether a supplier has requested such profile data from the DCC.

Additionally, migrations cannot be supported for FOC where the communications hub has been configured (via the SMSO) to enable the pushing of half hourly profile read data (corresponding to SRVs 4.8.1, 4.8.2 and 4.8.3) as there is no ability within the DCC solution to change this configuration. In order to remove this migration restriction and support the retrieval of profile data, two changes are required to the DCC solution:

- 1) The migration solution requires amendment to include a step whereby the S1SP sends commands to ensure that pushing of profile data in respect of the electricity meter and gas meter is disabled. This step will include a number of retries, following which, if still unsuccessful, the installation will be rolled back to the SMSO. If there is a rollback scenario, the migration can be reattempted.
- 2) The DCC solution that supports the subsequent processing of Service Requests requires amendment such that, upon receipt of 4.8.1, 4.8.2 or 4.8.3, the S1SP is able to retrieve the profile data. This functionality is being delivered by way of an 'interim fix' as part of Uplift 2.1 (to enable functionality to be delivered sooner) followed by an 'enduring fix' in July 2021.

The interim fix provides a solution which will enable data to be provided to all Suppliers and other eligible Users, for SRVs 4.8.x without using the S1SP database, by servicing the requests using data gathered from the device on demand.

The later change, scheduled for July 2021, will further optimise the solution implemented at Uplift 2.1, by introducing efficiencies in the collection of the overnight reads from devices. This will be achieved by enabling communications hub pushing of data in response to schedules set up by Suppliers and other users who want access to the data, and then SRVs 4.8.x can be serviced using data from the S1SP database.

The proposed changes to the migration solution would result in three changes to the TMAD:

- 1. The removal of clauses 4.24A and 4.24B which currently prevent the migration of Active and Dormant SMETS1 installations where data is being pushed by the communications hub,
- 2. The introduction of step 15.9.4.a whereby the S1SP sends commands as part of the migration, to disable the pushing of the data by the communications hub, and
- 3. The addition of a step within Appendix B, whereby the S1SP steps to configure the pushing of profile data to the communications hub is checked.

DCC intends to consult on amendments to the SMETS Supporting Requirements (S1SR) documents in March 2021 to support changes to the operational solution for the processing of the 4.8x SRVs.

No	TMAD Reference	Description and Rationale for Change	
1	Table 5.9 Column Heading	The exclusions or exceptions that were introduced as checks introduced to differentiate GroupID "EA" or "EB" on submission of a Migration Common File (MCF) are no longer required as the FOC fix in Uplift 2.0 introduces the file sequencing checks for the FOC cohort. Rename table header to "Migration Common File checks and processing for the	
		S1SP"	
2	Table 5.9		
		Delete from table 5.9 step 5.9.5 cell headed 'Checks and processing for the S1SP where GroupID = "EA" or "EB"'	
		Where the file is a Migration Common File confirm either that:	
		 the Authenticator holds a Migration Common File Stored Counter for the Requesting Party Identifier (RequestingPartyID) and the MCFCounter is greater than that Migration Common File Stored Counter; or the Authenticator does not hold a Migration Common File Stored Counter for this Requesting Party Identifier Should this check succeed, the Authenticator shall: 	
		 If it does not hold a Migration Common File Stored Counter for this Requesting Party Identifier (RequestingPartyID), create such a Migration Common File Stored Counter; and 	
		In all cases, set the Migration Common File Stored Counter to the value of MCFCounter.	
		1.	
3	Table 5.9	The FOC fix in Uplift 2.0 introduces the file sequencing checks for the FOC cohort.	
	5.9.6;	Checks introduced to differentiate GroupID "EA" or "EB" on submission of a Migration Common File (MCF) are removed.	
		Delete from table 5.9 step 5.9.6 cell headed 'Checks and processing for the S1SP where GroupID = "EA" or "EB"'	
		Where the file is a Migration Group File confirm either that:	
		 the Authenticator holds a Migration Group File Stored Counter for this Requesting Party Identifier (RequestingPartyID) and the MGFCounter is greater than that Migration Group File Stored Counter; or 	

No **TMAD Description and Rationale for Change** Reference 2. the Authenticator does not hold a Migration Group File Stored Counter for this Requesting Party Identifier (RequestingPartyID) Should this check succeed, the Authenticator shall: 1. If it does not hold a Migration Group File Stored Counter for this Requesting Party Identifier (RequestingPartyID), create such a Migration Group File Stored Counter; and 2. In all cases, set the Migration Group File Stored Counter to the value of MGFCounter. 4 Table 5.9 The FOC fix in Uplift 2.0 introduces the file sequencing checks for the FOC cohort. Checks introduced to differentiate GroupID "EA" or "EB" on submission of a 5.9.7 Migration Common File (MCF) are removed. Delete from table 5.9 step 5.9.7 cell headed 'Checks and processing for the S1SP where GroupID = "EA" or "EB"' Where the file is a Migration Group Encrypted File confirm either that: 1. the Authenticator holds a Migration Group Encrypted File Stored Counter for this Requesting Party Identifier (RequestingPartyID) and the MEFCounter is greater than that Migration Group Encrypted File Stored Counter; or 2. the Authenticator does not hold a Migration Group Encrypted File Stored Counter for this Requesting Party Identifier (RequestingPartyID) Should this check succeed, the Authenticator shall: 1. If it does not hold a Migration Group Encrypted File Stored Counter for this File Stored Counter; and

- Requesting Party Identifier (RequestingPartyID), create such a Migration Group
- 2. In all cases, set the Migration Group Encrypted File Stored Counter to the value of MEFCounter.

5 Table 5.9 The FOC fix in Uplift 2.0 introduces the file sequencing checks for the FOC cohort. Checks introduced to differentiate GroupID "EA" or "EB" on submission of a Step 5.9.8 Migration Common File (MCF) are removed.

Delete from table 5.9 step 5.9.8 cell headed 'Checks and processing for the S1SP where GroupID = "EA" or "EB"'

Where the file is a Migration Common Validation File confirm either that:

- 1. the Authenticator holds a Migration File Common Validation Stored Counter for this Requesting Party Identifier (RequestingPartyID) and the MVFCounter is greater than that Migration File Common Validation Stored Counter; or
- 2. the Authenticator does not hold a Migration File Common Validation Stored Counter for this Requesting Party Identifier (RequestingPartyID)

Should this check succeed, the Authenticator shall:

No ·	TMAD Reference	Description and Rationale for Change	
		 If it does not hold a Migration File Common Validation Stored Counter for this Requesting Party Identifier (RequestingPartyID), create such a Migration File Common Validation Stored Counter; and In all cases, set the Migration File Common Validation 	
6	Table 5.9 Step 5.9.9	 The FOC fix in Uplift 2.0 introduces the file sequencing checks for the FOC cohort. Checks introduced to differentiate GroupID "EA" or "EB" on submission of a Migration Common File (MCF) are removed. Delete from table 5.9 step 5.9.9 cell headed 'Checks and processing for the S1SP where GroupID = "EA" or "EB"' Where the file is a S1SP Commissioning File confirm either that: 1. the Authenticator holds a S1SP Commissioning File Stored Counter for this S1SP Identifier (S1SPID) and the SCFCounter is greater than that S1SP Commissioning File Stored Counter; or 2. the Authenticator does not hold a S1SP Commissioning File Stored Counter for this S1SP Identifier (S1SPID) Should this check succeed, the Authenticator shall: 1. If it does not hold a S1SP Commissioning File Stored Counter for this S1SP Identifier (S1SPID), create such a S1SP Commissioning File Stored Counter; and 2. In all cases, set the S1SP Commissioning File Stored Counter to the value of SCFCounter. 	
7	Clause 4.9	An amendment to the Clause 4.9 to clarify requirement for the values used in forecasting Daily Migration Demand. Where a Responsible Supplier does not notify the DCC of the Responsible Supplier's Daily Migration Demand for any particular Migration Week in accordance with Clause 4.8(a), the DCC shall use zero for the values of the most recently, previously notified Daily Migration Demand for that Responsible Supplier for the purposes of its migration scheduling in relation to that Migration Week.	
8	Clause 4.29	The validation performed on the Migration Common File (MCF) to allow for the exclusion of split supply sites is no longer required and this change removes provisions entered to differentiate for the FOC Cohort GroupID "EA" and "EB" Except where GroupID — "EA" or "EB" where there are two Responsible Suppliers for the Smart Metering Systems that together comprise the same SMETS1 Installation that contains only Dormant Meters, and they are Affiliates of one another, then the DCC may issue such notification only to the Responsible Supplier for the Electricity Smart Metering System and the Responsible Supplier for the Gas Smart Metering System shall be deemed to have received a notification for the purpose of this Clause 4.29.	

No ·	TMAD Reference	Description and Rationale for Change	
9	Clause 4.30	The validation performed on the Migration Common File (MCF) to allow for the exclusion of split supply sites is no longer required and this change removes provisions entered to differentiate for the FOC Cohort GroupID "EA" and "EB" Except where GroupID= "EA" or "EB" Where there are two Responsible Suppliers for the Smart Metering Systems that together comprise the same SMETS1 Installation that contains only Dormant Meters, and they are Affiliates of one another, then the DCC may issue such notification only to the Responsible Supplier for the Electricity Smart Metering System and the Responsible Supplier for the Gas Smart Metering System shall be deemed to have received a notification for the purpose of this Clause 4.30.	
10	Clause 4.32	The validation performed on the Migration Common File (MCF) to allow for the exclusion of split supply sites is no longer required and this change removes provisions entered to differentiate for the FOC Cohort GroupID "EA" and "EB" Except where GroupID = "EA" or "EB" where there are two Responsible Suppliers for the Smart Metering Systems that together comprise the same SMETS1 Installation, and they are Affiliates of one another, then the Responsible Supplier for the Electricity Smart Metering System may specify the Supplier and/or Network Operator Certificate IDs that it wishes the DCC to include in Commissioning Requests in respect of the Gas Smart Metering System, in which case the Responsible Supplier for the Gas Smart Metering System shall be deemed to have specified those Supplier and/or Network Operator Certificate IDs.	
11	Clause 4.35(c)	The validation performed on the Migration Common File (MCF) to allow for the exclusion of split supply sites is no longer required and this change removes provisions entered to differentiate for the FOC Cohort GroupID "EA" and "EB" Except where GroupID = "EA" or "EB", Clause 4.35 (b) shall also apply where there are two Responsible Suppliers for the Smart Metering Systems that together comprise the same SMETS1 Installation comprising only Active Meters, and they are Affiliates of one another, in which case the Responsible Supplier for the Electricity Smart Metering System shall give the required indication on behalf of itself and the Responsible Supplier	
12	Clause 4.38	The validation performed on the Migration Common File (MCF) to allow for the exclusion of split supply sites is no longer required and this change removes provisions entered to differentiate for the FOC Cohort GroupID "EA" and "EB" Except where GroupID ——"EA" or "EB", the Responsible Supplier for each Device listed in Table 4.38 shall provide the information required in that table for that Device. Where there are two Responsible Suppliers for the Smart Metering Systems that together comprise the same SMETS1 Installation comprising only Active Meters, and they are Affiliates of one another, the Responsible Supplier for the Electricity Smart Metering System may provide the required information for the SMETS1 ESME	

No ·	TMAD Reference	Description and Rationale for Change	
13	Clause 4.40	The validation performed on the Migration Common File (MCF) to allow for the exclusion of split supply sites is no longer required and this change removes provisions entered to differentiate for the FOC Cohort GroupID "EA" and "EB" Commissioning Requests that it processes. Except where GroupID = "EA" or "EB", Where there are two Responsible Suppliers for the Smart Metering Systems that together comprise the same SMETS1 Installation, and they are Affiliated of one another, then the Responsible Supplier for the Electricity Smart Metering System may provide the Network Operator Certificate ID	
14	Table step 5.9.10	This step was included to allow for a variation of the checks conducted for only Group ID "EA" and "EB. The technical fix introduced at Uplift 2.1 will allow checks to be conducted by the S1SP where an installation has split supply on migration. This validation step will be removed. Where the file is a Migration Common File confirm that all of the Supplier Certificate IDs refer to Certificates all of which contain User IDs allocated to the same Supplier Party. For the purposes of this check, the Null Certificate ID shall be treated as belonging to a different Supplier Party than any other Certificate ID. Where all Supplier Certificate IDs are the Null Certificate ID then the check will pass.	
15	Table 15.9 New step 15.9.4a	The interim technical correction introduced at Uplift 2.1 will allow for any comms hub that currently pushes profile data to the S1SP to have this functionality disabled on migration Insert new line to table 15.9 'S1SP / DCO Commissioning of SMETS1 Installation' as check step 15.9.4a The checks and processing shall be undertaken for 'Configure Pushing of Profile Data' for this Group ID, as specified in Appendix B of this TMAD. The error contribute of the profile Data' for this Group ID, Appendix B of this TMAD.	
16	Appendix B New section B7	insert, following B6 , a new section titled B7 Configure Pushing of Profile Data with section to identify the validation checks and associated errors when configuring the	

Description and Rationale for Change

Error code on failure	S1SP checks and processing	SupportingData
	Should any of the following checks fail, checking and processing in relation to that SMETS1 Installation shall not proceed to a subsequent step, except where otherwise stated	
ET11	Attempt to configure the CHF to disable pushing of ESMS's Profile Data Log (with its SMETS1 meaning) and confirm receipt of a successful response	
GT03	Where a GSMEDetail element is present, attempt to configure the CHF to disable pushing of GSMS's Profile Data Log (with its SMETS1 meaning) and confirm receipt of a successful response	

Table B7

17 Clause 4.24A

The fix introduced through Uplift 2.1, that prevents pushing half hourly profile data, remove clause 4.24A, that had been included to prevent migration of dormant FOC installations that pushed half hourly profile data to the S1SP.

Where GroupID = "EA" or "EB", the DCC shall take all reasonable_steps not to Migrate SMETS1 Installations comprising only Dormant Meters where any Device within that SMETS1 Installation is configured such that it would, were it to become Commissioned within DCC Systems, send half hourly consumption data to the relevant S1SP other than in response to an Instruction to do so from that S1SP.

18 Clause 4.24B

The fix introduced through Uplift 2.1, that prevents pushing half hourly profile data, remove clause 4.24B, that had been included to prevent migration of active FOC installations that pushed half hourly profile data to the S1SP.

Where GroupID — "EA" or "EB", the Responsible Supplier shall take all reasonable steps not to include within a Migration Authorisation any SMETS1 Installations comprising any Device that is configured such that it would, were it to become Commissioned within DCC Systems, send half hourly consumption data to the relevant S1SP other than in response to an Instruction to do so from the S1SP.

Table 1 - Overview of Drafting Changes

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

FOC_TMAD_U20_21 Q1

Do you agree with the proposed changes to the TMAD for FOC Uplifts 2.0 and 2.1? Please provide a rationale for your views.

3. Next Steps

Following the closure of this consultation, DCC will take into account respondents' views, and, subject to the consultation responses received, submit to BEIS an amended version of the TMAD, one to support the Uplift 2.0 Release, and another to support the Uplift 2.1 Release, 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 9 March 2021. DCC has discussed the redesignation 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 for FOC Uplift 2.0 on 23 March 2021 or as soon as reasonably practicable within one month thereafter. It is further 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 for FOC Uplift 2.1 on 18 May 2021 or as soon as reasonably practicable within one month thereafter.

In order to expedite the re-designation of the TMAD, DCC is seeking views on behalf of BEIS on the proposed date for re-designation of the separate FOC Uplift 2.0 version of the TMAD and FOC Uplift 2.1 version of the TMAD, as well as the draft designation direction which would be used in both cases, is presented in Attachment 1 of this consultation document for consideration.

FOC_TMAD_U20_21 Q2 Do you agree with the proposed re-designation date of **23 March 2021 for** Uplift 2.0 and the change applicable to all cohorts (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the TMAD using draft notification at Attachment 1?

FOC_TMAD_U20_21 Q3 Do you agree with the proposed re-designation date of **18 May 2021** for Uplift 2.1 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the TMAD using draft notification at Attachment 1?

4. How to Respond

Please provide responses in the attached template by 1600 on 26 February 2021 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 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.

5. Attachments

- Attachment 1 –TMAD Draft Direction Text
- Attachment 2 SEC Appendix AL SMETS1 TMAD v11.0 delta vs 11.1
- 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 communications 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 MM YYYY], the SMETS1 Transition and Migration Approach Document (TMAD) 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 the continuing effectiveness of anything done in 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.