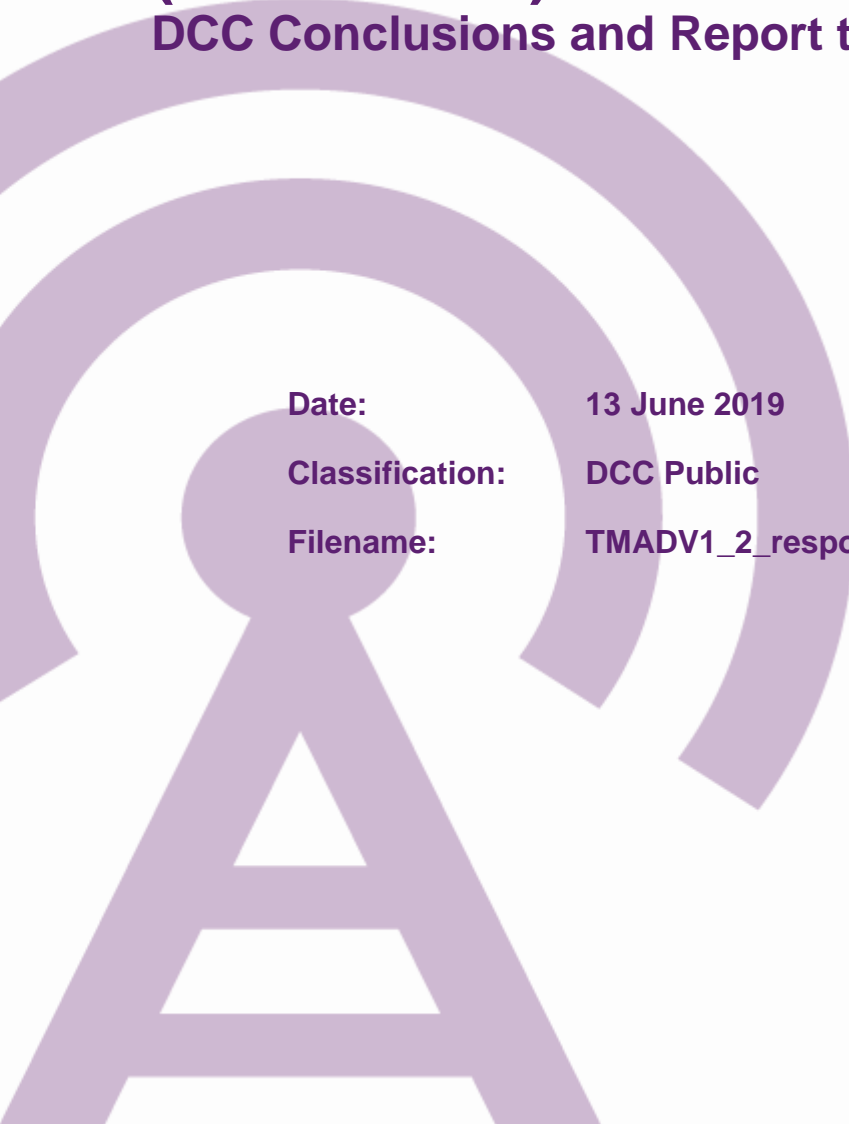


# SMETS1 Transition and Migration Approach Document (TMAD) for IOC (TMAD v1.2)

DCC Conclusions and Report to Secretary of State



<b>Date:</b>	13 June 2019
<b>Classification:</b>	DCC Public
<b>Filename:</b>	TMADV1_2_response_document

---

# 1 Contents

- 1 Introduction and Context.....3**
- 2 Regulatory Requirements.....3**
- 3 Consultation .....3**
  - 3.1 Consultation Questions .....3
  - 3.2 Respondents.....4
- 4 Analysis of Responses.....4**
  - 4.1 General Comments (Q1) .....4
    - 4.1.1 Respondent View .....4
    - 4.1.2 Areas of Disagreement .....4
  - 4.2 Detailed Comments.....5
    - 4.2.1 Respondent View .....5
    - 4.2.2 Areas of Disagreement .....5
  - 4.3 Secretary of State Re-designation (Q3).....5
    - 4.3.1 Respondent View .....5
    - 4.3.2 Areas of Disagreement .....6
- 5 Summary of Changes to the TMAD .....6**
- 6 Conclusions.....6**
- 7 Next Steps.....7**
- 8 Attachments .....7**

# 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 designated by the Secretary of State on 14 February 2019 and included in the Smart Energy Code (SEC) from version 6.6 onwards as Appendix AL of the SEC.

On Friday 3 May 2019, DCC issued a consultation on a few minor changes to the TMAD that are required for the first Capability Release for the SMETS1 Service, known as the Initial Operating Capability (IOC), indicating that DCC considers that these changes to the TMAD do not impact IOC go-live. This document provides DCC's conclusion to that consultation consistent with the relevant SEC requirements.

## 2 Regulatory Requirements

This section details the regulatory requirements for production of TMAD. The TMAD is produced pursuant to Section N6.4 of the SEC and re-designated under the terms of Section X5 of the SEC.

## 3 Consultation

On Friday 3 May 2019, DCC published the consultation document titled '[Consultation on changes to the SMETS1 Transition and Migration Approach Document \(TMAD\) for IOC](#)' on the DCC Website and DCC's Service Desk also emailed stakeholders to notify of the publication.

The key scope of the consultation was the following areas:

- [APPENDIX AL SMETS1 Transition and Migration Approach Document V1.1 DELTA](#); which included this schema [SMETS1 Migration Schema v1.0 TMAD 2.0.xsd](#);
- a draft Secretary of State Direction for approval / re-designation of the documentation; and
- the envisaged decision date for the Secretary of State.

Stakeholders were invited to respond by 16:00 on Friday 24 May 2019 in a template format that was attached to the consultation.

### 3.1 Consultation Questions

The [consultation response template](#) presented 3 specific questions as presented in Figure 1.

Figure 1 – TMAD v1.1 Consultation Questions

Number	Question
TMAD Q1	Do you have any general comments on the changes to the TMAD for IOC?

Number	Question
<b>TMAD Q2</b>	Do you have any detailed comments on the changes to the legal drafting in TMAD? Please provide a rationale for your views.
<b>TMAD Q3</b>	Do you agree with the proposed re-designation date of Monday 10 June 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the TMAD using the draft direction at Annex A?

## 3.2 Respondents

The consultation closed on Friday 24 May 2019. DCC has received 7 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.

## 4 Analysis of Responses

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

### 4.1 General Comments (Q1)

**TMAD Q1 Do you have any general comments on the changes to the TMAD for IOC?**

#### 4.1.1 Respondent View

One respondent sought confirmation that there will be a revision to TMAD for future capability releases (known as Middle, and Final Operating Capabilities – MOC and FOC respectively); DCC can confirm that MOC and FOC specific changes are presently being documented and will be the subject of future consultation.

One respondent expressed the view that the SEC is difficult to understand as the TMAD presents temporary changes to the other sections of the SEC. This respondent accepted it was legally robust but DCC should consider how best to support Users to fully understand their obligations.

One respondent asked if DCC could provide a further version control section in TMAD to provide clarity on how future versions of the TMAD apply to specific capability releases. DCC recognises the need to address this and as such each version of TMAD is applicable for a specific set of Group IDs which are attributed to each of the Individual Operating Capabilities via the Eligible Product Combinations List (EPCL). In the consultation wrapper for future TMAD changes for MOC and FOC, DCC will provide clarity on applicability of TMAD version changes to respective Group IDs.

#### 4.1.2 Areas of Disagreement

DCC notes the concern expressed regarding the transitional nature of the TMAD. In principle, the TMAD only applies to migration matters and DCC considers the scope for confusion to be low. However, DCC will make reasonable efforts to clarify any future TMAD changes to impacted SEC parties to limit any perceived scope for confusion.

---

## 4.2 Detailed Comments

**TMAD Q2 Do you have any detailed comments on the changes to the legal drafting in TMAD? Please provide a rationale for your views.**

### 4.2.1 Respondent View

One respondent expressed explicit support for each of the changes to the TMAD with other respondents choosing to only highlight areas of further concerns.

A few respondents welcomed the changes to the TMAD such that DCC will add the Electricity Distributor's Network Operator Certificate IDs where the Responsible Supplier has not provided them. Some respondents suggested that DCC should go further and insert the Network Operator (and Gas Transporter) certificates in all circumstances as this would avoid any risk of data quality issues caused by a Responsible Supplier inadvertently providing incorrect certificate details in the Migration Authorisation file. A respondent also asked how the DCC plans to obtain Network Operator certificate IDs; DCC's MCC team has procured the Network Operator certificate serial numbers and Issuer name from the SECAS website and, during July 2019, DCC is planning to write to individual Electricity Network Operator for written authentication of the Certificates that it wishes DCC to utilise for the given MPANs.

One respondent asked how the Network Operator keys are added in the circumstances where there are both an Active Meter and a Dormant Meter within the SMETS1 Installation. DCC has considered this matter and would like to clarify that for circumstances where the GSME is an Active Meter and the ESME is a Dormant Meter on the same SMETS1 installation, DCC will be unable to populate a Network Operator certificate given the processing arrangements for Migration Authorisation and population of Network Operating Certificates. The suppliers will be responsible for updating the Network Operator certificates post commissioning when necessary to comply with the SEC obligation.

### 4.2.2 Areas of Disagreement

DCC notes support for the approach that DCC will add the Electricity Distributor's Network Operator Certificate IDs where the Responsible Supplier has not provided them. However, DCC considers that the TMAD approach is appropriate and moving to an approach whereby a Responsible Supplier never provides a certificate would increase risk of migration failures as set out above. The TMAD approach aligns to the enduring SEC arrangements whereby the Responsible Supplier provides a certificate. Also, the TMAD process includes a check that the certificate is valid. DCC observes that if a Responsible Supplier doesn't believe it has the correct DNO certificate then it would be prudent to not provide the data within the Migration Authorisation file. Finally, DCC confirms that it cannot insert Gas Transporters' certificates, as there is insufficient data within the MPRN to allow DCC to identify the Gas Transporter for each GSME.

## 4.3 Secretary of State Re-designation (Q3)

**TMAD Q3 Do you agree with the proposed re-designation date of Monday 10 June 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the TMAD using the draft direction at Annex A?**

### 4.3.1 Respondent View

DCC received a response from 5 of the 7 respondents on this matter with 4 respondents expressing unconditional support for the date and text that was provided as Attachment 1 of

consultation document. DCC concludes that respondents were content with the draft direction text and data for re-designation.

One respondent didn't express a view on the date or text but expressed general concern that there may be uncertainty over whether migrated dormant SMETS1 Installations are operating correctly particularly if there is a prolonged period between completing individual SMETS1 Installation migration, and the Responsible Supplier interacting with the meters via DCC. In relation to this respondent's concern, the DCC notes that this risk is minimised if Responsible Suppliers take the necessary steps to operate the migrated SMETS1 installation via DUIS.

### 4.3.2 Areas of Disagreement

n/a.

## 5 Summary of Changes to the TMAD

The consultation process has given rise to the change to the TMAD as presented in Figure 2. Also, there are a few minor drafting changes within the legal drafting to amend for typographical / formatting errors.

**Figure 2 – Changes to the TMAD**

Drafting Change	Description and Rationale for change
<b>Clause 4.48 – Electricity Distributor Network Operator Certificate IDs</b>	Amended to provide clarity on circumstances where DCC will not apply Network Operator Certificates when Suppliers have not provided the Network Operator Certificates.

## 6 Conclusions

DCC is confident that the revised draft TMAD, submitted to the Secretary of State reflects the requirements for document submission that are set out in SEC Section N6.4. DCC has had appropriate consultation with industry regarding these changes to the TMAD. It is DCC's view that it has met its SEC obligation to consult with parties and to address the points raised consistent with the relevant regulatory obligation. The TMAD revisions are in line with the overall solution design for the SMETS1 Service and other relevant documents.

DCC considers that:

- the revised TMAD is defined to a sufficient level of detail for re-designation into the SEC;
- the revised TMAD provide an overarching framework which sets out clearly and unambiguously parties' rights and obligations which are consistent / and aligned with the rest of draft SEC requirements in relation to SMETS1 Services; and
- the revised TMAD deliver the regulatory requirements specified in the SEC and the Licence, are materially complete, and the content is technically accurate.

In summary, DCC considers that the revised TMAD is fit for purpose.

---

## 7 Next Steps

Following the submission of the TMAD to the Secretary of State, DCC expects the Secretary of State to make a decision on whether and when to re-designate the revised TMAD into the regulatory framework.

## 8 Attachments

- Attachment 1 Draft Secretary of State Direction
- Attachment 2 Appendix AL SMETS1 Transition and Migration Approach Document V1.2 (clean)
- Attachment 3 Appendix AL SMETS1 Transition and Migration Approach Document V1.2 (DELTA against V1.1 i.e. prior consultation)
- Attachment 4 Appendix AL SMETS1 Transition and Migration Approach Document V1.2 (DELTA against existing Appendix AL of the SEC).
- Attachment 5 SMETS1 Migration Schema v1.0 TMAD 2.0.xsd (XML scheme) - unchanged