E.ON response to DCC Consultation on the Migration Error Handling and Retry Document (July 2017)

General Comments

E.ON welcome the opportunity to respond to the DCC Consultation on latest version of the SMETS1 Migration Error Handling and Retry (MEHR) document. We note that the DCC has made specific amendments to the draft MEHR version shared a number of months ago, and many of these amendments are welcomed on the basis of the additional clarity they provide.

E.ON believes that efficient investigation and resolution of migration errors by the DCC and its SMETS1 Service Providers is essential. Where this does not occur, there is the real potential for outcomes that negatively impact energy consumers, Responsible Suppliers and other industry parties. Given these potential impacts, we believe that further revisions to the MEHR document are required to provide additional clarity ahead of migrations progressing at scale.

Q1. Do you have any detailed comments on Migration Error Handling? Please provide a rationale for your views.

Our review of the latest MEHR document has identified the following comments.

Sharepoint Unavailability

The DCC has taken the decision to utilise its Sharepoint service to support the transmission of key migration files between different parties. E.ON believes that a number of these migration files are time critical, owing to the role that they play in subsequent migration steps or due to the requirement to submit ahead of defined deadlines.

Depending on the timing and duration of any DCC Sharepoint outage, it is conceivable that Responsible Suppliers could be adversely impacted. For example, where a Sharepoint outage impacted the submission of *Indicative Migration Forecasts* or *Migration Authorisations* ahead of DCC deadlines, this could affect the equitable allocation of migration capacity between competing Responsible Suppliers.

While this may appear to be a minor inconvenience, E.ON is keen to ensure that migration capacity can be requested and allocated in a robust and efficient way. Securing migration capacity will enable subsequent internal E.ON processes to be initiated, including communications to energy consumers in certain circumstances. Additionally, the combination of limited DCC migration capacity and the BEIS 2020 SMETS1 Enrolment and Adoption backstop deadline also must be considered, as these could result in unintended outcomes that drive the early replacement of operating SMETS1 Compliant assets.

We believe that the DCC should further clarify the "suitable workarounds" that would be utilised to ensure file submissions could continue during Sharepoint outages.

Migration Failure – SMETS1 Replacement

Multiple sections of the MEHR include the statement "…*The Responsible Supplier can…replace the SMETS1 Installation with SMET2 in due course*…" as a remedial action for certain migration failure scenarios.

Prior to migration commencing, communications between the SMSO and the SMETS1 Compliant assets must be confirmed, ensuring that the assets are operational and eligible for migration. As such, E.ON believes that the DCC must take all reasonable steps to ensure that its migration processes eliminate this SMETS1 stranding risk. Early replacement of operational SMETS1 Compliant assets causes disruption to impacted energy consumers and imposes costs on Responsible Suppliers and Meter Asset Providers.

As such, E.ON believes that the DCC must clarify the MEHR wording referring to this resolution option.

Migration Failure – Suggested Rescheduling Action

Multiple sections of the MEHR highlight a default remedial solution of "…*The suggested action on the supplier is to schedule the failed SMETS1 installation into a subsequent Migration Week*…". While this is one remedial solution, E.ON is concerned that the MEHR appears to propose this as the default solution to many different types of failure.

It is important to note that a range of the migration failure scenarios detailed in the MEHR are not triggered by Responsible Supplier action or inaction. Typically, the triggers are issues within the DCC processes or at a DCC Service Provider, yet resolution falls to the Responsible Supplier. Additionally, if the migration issue was identified after the APN change, rescheduling to a subsequent migration week may only be possible if the DCC has successfully completed rollback of the impacted assets.

E.ON believes that the rescheduling of a failed SMETS1 migration into a subsequent migration week should be an *exceptional* outcome, rather than the default approach. In certain cases, E.ON will have initiated other steps or processes resulting in communications to the energy consumers impacted. Where the impacted migrations involve PAYG customers, a delay of multiple weeks could be more problematic given that Responsible Suppliers must take steps to ensure that energy supply to these customers is protected during the DCC migration process.

As such, we believe that the DCC must reconsider specific scenarios outlined in the MEHR to identify alternative and suitable remedial options.

Migration Failure Reporting – Pay As You Go Impact

Reviewing MEHR Section 2.6.5, we understand that the DCC will report rollback success or failure outcomes through the Migration Authorisation Completion Response file and specific supplier-facing reports generated by the Migration Reporting Regime. The notification of individual rollback outcomes is time-critical to Responsible Suppliers, particularly in the case of PAYG customers. A

scenario where DCC notifications are only delivered through scheduled daily reports, is likely to result in PAYG customers being adversely impacted and potentially losing their energy supply if they are unable to top-up. We acknowledge that PAYG customers will not be involved in early SMETS1 migrations, and on this basis we believe this topic can be addressed during DCC-led multilateral sessions and MEHR iterations in the coming months.

Migration Failure – Suspension of DCC Migration Activity

While the MEHR document outlines different scenarios, the descriptions appear to be focussed on cases involving small volumes of SMETS1 meter assets at any one time. It's conceivable that an incident could require the DCC to suspend migration activities for some or all SMETS1 meter cohorts to support triage and remediation. While we hope this scenario will not materialise, E.ON believes that the MEHR should include this outcome as an option.

Dormant/Dormant SMETS1 Installation

While the MEHR refers to the triage of Active/Active and Active/Dormant SMETS1 installations, there is no reference on how issues impacting Dormant/Dormant installations will be handled. While these migrations are initiated by the DCC, it is reasonable for Responsible Suppliers to expect to be kept informed on issues affecting their on-supply energy consumers. Given migrations will start with Dormant SMETS1 installations, we would welcome further information on the triage approach adopted by the DCC Migration Control Centre should issues occur.

Migration Control Centre Notification

Specific sections of the MEHR suggest that the DCC Migration Control Centre will contact impacted Responsible Suppliers "…via telephone and email…". While this proactive contact is welcomed by E.ON, additional controls will be required. The DCC should confirm which Nominated Contact lists will be used, and how these will be maintained over the 12 to 18-month window when migrations will be taking place across the different cohorts. Additionally, the DCC may wish to consider how Responsible Suppliers can effectively validate the identity of a caller or E-Mail purporting to be from the DCC.

SMETS1 Supporting Requirements Configuration Requirements

MEHR Section 2.5.3 includes a statement indicating that migrations may not proceed if "…*the Device is not configured in accordance with the requirements of the SMETS1 Supporting Requirements [document]*…". Recent changes to the S1SR document now state that reconfiguration of the SMETS1 asset is required "…*where doing so would not result in a material delay to enrolment*…". On this basis, we believe the MEHR should be aligned with the S1SR on this topic.

Q2. Do you have any detailed comments on the types of exceptions/errors that could occur? Please provide a rationale for your views.

Additional Error Codes [Table A.1]

We believe that additional DCC error codes are potentially required for the following scenarios and outcomes:

- SMETS1 meter that has been permanently stranded during a previous enrolment attempt.
- Migration already initiated and underway.
- Already successfully enrolled SMETS1 meter.

Q3. Do you have any detailed comments on the Retry and Timeout Strategy? Please provide a rationale for your views.

E.ON welcomes the additional clarity in this area, and have identified two specific queries on this topic.

Retry Duration

The MEHR document states that the S1SP will attempt to re-establish contact with the Comms Hub for up to 24 hours, before reconfiguring the SIM profile to enable the SMSO to attempt to contact. While E.ON accepts there has to be a time limit, we are unclear how the 24 hour limit has been established by the DCC. It is possible that limiting retries to this short period may not allow for issues such as intermittent communications or S1SP / WAN congestion to be overcome or resolved.

Retry Attempts

The MEHR document details an example of the frequency of retry attempts that would be initiated by the DCC. We would welcome the DCC confirming our understanding that these retries would not need to be factored into our volume-based submissions to the DCC (e.g. Anomaly Detection Threshold or other migration-specific submissions).