

Submitted by email to enrolment.adoption@smartdcc.co.uk SSE 1 Forbury Place 43 Forbury Road Reading Berkshire RG1 3JH

02 July 2019 emslie.law@sse.com

Dear Colleague,

Re Migration Error Handling and Retry Document Consultation - REQ000000146258

We welcome the opportunity to respond to the Consultation Migration Error Handling and Retry Document Consultation.

We have several items we would like further clarification upon and these are detailed below.

We have defined our answers, including the said queries and clarifications, to the 4 MEHRD questions posed below in Annex A.

We would be happy to discuss any of the points made in further detail with yourselves or BEIS if required.

Yours sincerely,

Emslie Law Governance Manager – Regulation & Smart Technologies



Annex A

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

Critical Comment we would appreciated a response to understand the Error Handling in itself:

• Report 6 is frequently referenced; however, we cannot locate the data element that contains the Error Code / FailedStepNumber mentioned. It is stated that Report 6 is used to communicate various errors, including the MAF Error Response Code (Max Length 5, e.g. MA001); however, the report format for Report 6 in MRR does not contain this data item? On the other hand, for Report 10, the 'Data Element' contains 'Reason Code, O, Text 5'. (Length is 5 so it matches MA010 etc). We can clearly see where this MA001 would be found. Please clarify which data element in Report 6 will inform us of the Error Code?

Is it possible that is it the 'Validation Reason Code'? But its Max Length is 55? And Field type said 'either Failure / Warning? Could it be the 'Failure MA0010 / Warning 12.9.1X etc? or Warning MA101 Incident Number etc if it is an error from SMSO/CSP/S1SP/DSP?? The format for Report 2 should be adopted for Report 6, separating 'Failed step Number' and 'Error Code'. As it stands, it is complicated and unclear.

We would also require example reports for each report described in MRR. As it is unclear how multiple error will be feedback.

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

Please find additional feedback:

• Report 6's title is confusing 'previous migration day', but the Supplier will actually get this for 'previous migration days'?

- Not all sections state the recommended actions for Suppliers and the reports. For example,
- o 2.5.6-2.5.10,
- o 2.6.1, 2.6.7
- o 2.7.1-2.7.6

Could confirmation be provided that, for these errors apart form, in some cases, the Incident notified via SSI to Suppliers, we will also get these in a report? If there are no reports, Suppliers would not know how long to wait. Or is the expectation that Suppliers are to resubmit to MA as soon as the Migration Date indicated within the MA expires? There is no mention for Suppliers to resubmit, the S1SP is assumed to hold on to the sites until such time the incident is resolved? Can clarity on this be sought please?

For those that state 'process backlog', should it not also state that if MA expires, Suppliers also then need to re-raise?

- 2.6.5 there are two types of possible errors stated:
- o a.) DCO/ S1SP unable to delete any keys/ info stored during commissioning attempt;
 - There is no report listed and required actions from Suppliers such as resubmission
- o b.) S1SP unable to restore WAN between SMETS1 installation and SMSO



- only described Error and reports, does not describe incident raised and resolution? Or is it because of the SMETS1 WAN, the only resolution for Suppliers is to replace or liaise with SMSO / S1SP? This must be explicit.
- 2.7.5 no incident Target Resolution Time specified?

2.3.1 Migration Authorisation Signature Error

Once this is reported, and resolved, can we resubmit for migration that week? Can the timescale be confirmed as 'by Thursday 10am'?

As per the Conclusion for MAM, it was stated that the earliest point Suppliers can submit the MA is after receiving the Demand Commitment in Week 2.

Can it be reiterated that it is okay for Suppliers to submit the MA, for example, in Week 3 for Week 5?

2.3.2 Migration Authorisation File Error

• It states that Report 6 will also be used to communicate this error. However, the report format for Report 6 in MRR does not contain this data item. For Report 10, the 'Data Element' contains 'Reason Code, O, Text 5'. (Length is 5 so it matches MA010 etc). Please clarify which data element in Report 6 will inform us of the Error Code please?

• As Suppliers will get the error code back the same night in the report 10, is it no possible to correct the file and resubmit? The loss of a week due to, potentially, one error in the file is a concern to us being able to manage our deployment profile. Can confirmation be obtained that error, for one Installation, will not going cause the whole file to reject? It would be useful to clarify the title for this section as 'Migration Authorisation File Error' as it is misleading if it does not actually refer to whole file error? As the Validation checks relates to individual sites?

• Critical comment –the opening paragraph states 'On receipt of MA (in relation to Active or Dormant meters) ...'. Report 6 & 10 are only for the MA submitted by Active Responsible Suppliers. Can it be confirmed that these reports will also show the Dormant Responsible Supplier the failure of Dormant Migration? Even when this MA is submitted by DCC for Dormant?

Appendix A, Table A1

- MA013 MA015 Can we obtain confirmation that these are for the DCC when they submit a Dormant MA internally. Would a Supplier get these on the report 2/6? It would be apparent that there is nothing an Active Supplier can do for Dormant Migration so it would be useful for this to be clearly stated as such. As per the last paragraph in 2.3.2 stating 'Suggested action on RS is to review....and resubmit'. This paragraph does not appear to be applicable for these DCC only error code? It'd be useful for Dormant supplier to know but there is nothing that can be done.
- As above, internally within the DCC, assuming submission of some form of MA to other parties/ internally, does this follow the Week1 Week 5 timeline that Suppliers have to follow? If so, does it mean that if the is notification of an error ,say for MA012, that the DCC would not have to wait for another week to resubmit to their own internal entities?
- Could consideration be made for combining Table in 2.3.2 and Appendix A1?



- MA106 would be useful to add that the DCC will coordinate between Suppliers as stated in TMAD?
- MA112 would we receive these for Dormant ITRON meters? We are interested in knowing whether these can turn this check on and off.

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

SSE has no comments to add.

MERD Q4 Anything else that you think is important? Please provide a rationale for your views.

• Please could example reports for each Report listed in MRR be provided? – Especially useful to clarify what Suppliers would receive for Data Elements such as 'Validation Reason Code' as stated in critical comment above.

• MCC will contact the Supplier for Migration Authorisation Signature Error – When will the DCC approach the Supplier to obtain contact method?

• TMAD v1.2 Clause 4.48 –

o We would like to ask DCC that if we are the Active GSME Supplier in this scenario, if the Dormant ESME Responsible Supplier has yet to apply their keys within 7 days to meet the PCO, would it be a problem for us to apply our keys?

o Would the ESME supplier need to apply their keys first before a GSME supplier be able to apply theirs?

- Typos
- o Appendix A Migration <u>D</u>eporting Regime