

SMETS1 Transition and Migration Approach Document (TMAD) for MOC (MDS) (TMAD v1.4)

DCC Conclusions and Report to Secretary of State

Date: 22 November 2019

Classification: DCC Public



1 Contents

- 1 Introduction and Context.....3**
- 2 Regulatory Requirements.....3**
- 3 Consultation3**
 - 3.1 Consultation Questions4
 - 3.2 Respondents.....4
- 4 Analysis of Responses.....4**
 - 4.1 General Comments (Q1)4
 - 4.1.1 Respondent View4
 - 4.1.2 Areas of Disagreement4
 - 4.2 Detailed Comments.....5
 - 4.2.1 Respondent View5
 - 4.2.2 Areas of Disagreement6
 - 4.3 Secretary of State Re-designation (Q3).....6
 - 4.3.1 Respondent View6
 - 4.3.2 Areas of Disagreement7
- 5 Summary of Changes to the TMAD7**
- 6 Conclusions.....7**
- 7 Next Steps.....8**
- 8 Attachments8**

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 current TMAD (which covers requirements for the Initial Operating Capability (known as 'IOC') for SMETS1 Services) was designated by the Secretary of State on 28 July 2019 and included in the Smart Energy Code (SEC) from version 6.14 onwards as Appendix AL of the SEC.

Subsequently, there are a limited number of changes to the TMAD that are required for the Middle Operating Capability (MOC) and Final Operating Capability (FOC). The MOC release includes two cohorts of devices, a Honeywell Elster device set operated via MDS as the SMSO (henceforth referred to as MOC (MDS)), and a Secure device set operated by Secure as the SMSO (henceforth referred to as MOC (Secure)). The FOC release covers the Trilliant and Landis+Gyr device set, currently operated by three SMSOs. DCC has updated the TMAD to include changes for MOC (MDS), which was issued for consultation on Friday 9 August 2019. Concurrently, DCC is also developing subsequent TMADs that covers the MOC (Secure) cohort and FOC cohort, which will be released in the near future for consultation. DCC considers it prudent to provide a separate TMAD consultation for each MOC cohort and FOC so that the changes can be clearly understood by those impacted.

This document provides DCC's conclusion to the MOC (MDS) TMAD consultation consistent with the relevant SEC requirements. Please note that this version of TMAD continues to support migration of the IOC cohort, and hence is considered to cover both IOC and MOC (MDS) devices.

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 will be re-designated under the terms of Section X5 of the SEC.

3 Consultation

On Friday 9 August 2019, DCC published the consultation document titled '[Consultation on changes to the SMETS1 Transition and Migration Approach Document \(TMAD\) for MOC \(MDS\)](#)' on the DCC Website. 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 V1.4 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 6 September 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 v1.4 Consultation Questions

Number	Question
TMAD Q1	Do you have any general comments on the changes to the TMAD for MOC (MDS)?
TMAD Q2	Do you have any detailed comments on the changes to the legal drafting in TMAD? Please provide a rationale for your views.
TMAD Q3	Do you agree with the proposed re-designation date of 04 October 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the TMAD using the draft direction at Attachment 1?

3.2 Respondents

The consultation closed on Friday 6 September 2019. DCC received 6 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 MOC (MDS)?

4.1.1 Respondent View

One respondent highlighted that TMAD Clause 6.5 appears to contradict the Industry Guide v2 with respect to commissioning alerts – TMAD states that the N55 alert will not be sent by the S1SP for Smart Meters commissioned by the Commissioning Party, whereas the Industry Guide says it will. DCC acknowledges the contradiction and has amended TMAD Clause 6.5 to align with the Industry Guide as this reflects the implemented solution.

One respondent raised a query relating to the FOC cohort, this will be addressed in a future version of TMAD.

4.1.2 Areas of Disagreement

One respondent suggested the inclusion of a Document Versioning control page, or a separate Changes Made document. The change control process for the TMAD (as Appendix AL of the Smart Energy Code) is covered by the change control regime that applies to the

wider SEC as controlled by SECAS and DCC has highlighted this response to SECAS. All proposed changes were detailed in the consultation document and any further changes made as a result of consultation responses are documented within this conclusion document.

4.2 Detailed Comments (Q2)

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 queried the migration process where a Supplier is operating multiple SMSOs, and whether capacity can be swapped between SMSOs.

The process, as prescribed in the TMAD and Migration Authorisation Mechanism (MAM) is as follows:

1. each Supplier submits their Indicative Migration Forecast (IMF) by Smart Metering System Operator (SMSO) 6 months in advance of migration;
2. each Supplier then submits their Demand Requirements by SMSO to DCC 4 weeks in advance of migration, who assess the submission against the other requests against that SMSO and respond with a Migration Demand Commitment (MDC) back to each Supplier 3 weeks prior to migration; and
3. one week prior to migration each Supplier sends DCC a Migration Authorisation (MA) file per SMSO, each Supplier can submit a higher quantity in the MA above their MDC but DCC may not be able to fulfil the additional requests.

Swapping agreed quantity between SMSOs may be possible depending on the SMSO and their available capacity. However, there may be other capacity constraints beside the SMSO, such as DCO or DSP. Consistent with the provisions of TMAD, DCC will take all reasonable steps to honour the MDC; where this cannot be met as per the DCC's obligations they will inform the Supplier at the earliest opportunity. We are not, however, proposing changes to allow suppliers to "formally" swap MDC between different SMSOs.

One respondent expressed concern that 'rollback' or 'recovery' may be excluded from the responsibilities of the SMSO by default as a result of Clause 3.1A. DCC can clarify that rollback, and recovery in the context of rollback, is performed by the S1SP and hence is carried out using systems that form part of the DCC Total System.

One respondent queried whether Clause 4.8 only applied to active meters, DCC can confirm that it does only apply to active devices.

Two respondents raised queries relating to Section 5.9.10 and how that validation step will work for split sites, i.e. where the ESME and GSME have different Suppliers, or where it is the same Supply business with differing SEC Parties, one SEC Party for gas and one SEC Party for electricity. DCC is investigating the issue and is considering the content of potential solution options to present to industry.

One respondent queried the drafting of Clause 7.14, concerned that it could lead to compliant assets being inadvertently stranded on the MDS SMSO service, rather than being migrated to the S1SP. Clause 7.14 points to further detailed requirements in the GroupID

specific sections of TMAD and is intended to reference activity that is required post a successful migration to remove access to the devices for the previous SMSO.

Clause 7.14 is present to ensure that all actions required from the SMETS1 SMSO acting as the Requesting Party on behalf of DCC to enable Clause 14.14 are completed. As the Clause only relates to successfully migrated devices (on to the S1SP) it cannot result in compliant assets being stranded on the MDS SMSO service.

4.2.2 Areas of Disagreement

One respondent challenged the change in Clause 3.2, and the preceding section heading, to reflect the current title of SEC Appendix AC (Inventory, Enrolment and Decommissioning Procedures). Two clauses of Appendix AC are referenced in TMAD hence DCC is of the opinion that it is appropriate to align the reference within the document.

One respondent suggested changing Clause 3.17 to insert the SMETS1 SMSO, however it is not always the SMETS1 SMSO that DCC will be requesting to perform actions during the migration of dormant devices, as such DCC do not believe it is appropriate to narrow the scope of the Clause.

One respondent objected to the change in Clause 4.2, DCC would like to clarify that we are not looking to limit validation. Clause 4.2 provides for a service between the SMSO / Requesting Party and the energy supplier whereby the energy supplier requests that the SMSO submits a Migration Common File for early validation. This is not part of the migration process. As SMSO's will become ready to provide this service at different times Clause 4.2 was amended to indicate that DCC would inform energy suppliers of when the SMSO was ready to offer the service.

One respondent queried the omission in the consultation document to references to the addition of Clauses 12.13 and 13.15. These were not referenced in the consultation document as they are both marked in TMAD as "NOT USED" so we did not consider this to be a material change.

4.3 Secretary of State Re-designation (Q3)

TMAD Q3 Do you agree with the proposed re-designation date of 4 October 2019 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the TMAD using the draft direction at Attachment 1?

4.3.1 Respondent View

DCC received a response from 5 of the 6 respondents on this matter with 3 respondents expressing unconditional support for the date and text that was provided as Attachment 1 of the consultation document. DCC concludes that respondents were content with the draft direction text and date for re-designation. The proposed re-designation date within the consultation has already passed, as such TMAD will be re-designated by BEIS at a future date, but prior to MOC (MDS) going live.

One respondent provided no comment on this question.

One respondent expressed a desire for the split supply issue be resolved in this current version of TMAD.

4.3.2 Areas of Disagreement

DCC is considering proposals relating to split supply solution. Any changes that are proposed will be addressed in a future version of TMAD.

5 Summary of Changes to the TMAD

In light of the consultation responses received, further changes to the TMAD are presented in Figure 2, deleted text in red.

Figure 2 – Changes to the TMAD

Drafting Change	Description and Rationale for change
<p>Clause 6.5 - Where an S1SP receives a Commissioning Request that in accordance with, and subject to, Clause 8.1 is to be treated as a 'Commission Device' Service Request (with its DUIS meaning) for a Device communicating via a CHF that it has established communication with pursuant to Clause 5.27, the S1SP shall establish that Device's Device Model using the Smart Metering Inventory and undertake the processing required for such a Device Model according to the S1SP requirements in the SMETS1 Supporting Requirements. Upon successful completion of the required S1SP processing, where the relevant Service Request is a Commissioning Request, the S1SP shall issue an S1SP Alert, populated according to Table 6.5. For clarity, S1SP Alerts are defined in Version 3.0 of the DCC User Interface Specification, therefore a User that has not yet sent a Service Request using Version 3.0 of the DUIS XML Schema shall not receive such S1SP Alerts. For Smart Meters which are commissioned by the Commissioning Party, the S1SP shall not issue corresponding SMETS1 'Device Commissioned' Alerts to the Responsible Supplier for that Smart Meter.</p>	<p>Amendment corrects an inconsistency between TMAD and a previously published industry guide. The amendment also better reflects the existing DCC solution.</p>

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 is of the opinion that it 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 is 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 provides 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 delivers the regulatory requirements specified in the SEC and the DCC 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 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 Appendix AL SMETS1 Transition and Migration Approach Document V1.4 (clean)
- Attachment 2 Appendix AL SMETS1 Transition and Migration Approach Document V1.4 (DELTA against existing Appendix AL of the SEC).
- Attachment 3 SMETS1 Migration Schema v1.0 TMAD 2.0.xsd (XML scheme) - unchanged