

SMETS1 Improvement Consultation

A SMETS1 Consultation on migration process improvement via changes to the Transition and Migration Approach Document (TMAD), Migration Authorisation Mechanism (MAM) and Migration Scaling Methodology (MSM)

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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 is Appendix AL of the Smart Energy Code¹ (SEC) and the latest version (AL 12.0) was included in the SEC on 30 March 2021. The TMAD requires that DCC develop a number of 'child' documents² which provide further operational and technical details.

Clauses 4.11 and 4.12 of the TMAD cover the arrangements for the initial development and subsequent change of the Migration Scaling Methodology (MSM). The MSM details how the daily operational constraints will be managed in the circumstance where Migration demand exceeds Migration capacity. The current version of the MSM came into effect on 4 January 2021 as Version 4.0 and is available on the DCC website³.

Clauses 4.35 to 4.44B of the TMAD set out details of Migration Authorisations and the Migration Authorisation Regime. This includes details of the process that DCC is required to undertake when making changes to the Migration Authorisation Mechanism (MAM). The MAM covers the arrangements for each Responsible Supplier to send a Migration Authorisation to DCC. It also makes provision for certain information exchanges relating to the Migration of Dormant Meters. The current version of the MAM came into effect on 23 April 2021 as Version 4.0 and is available on the DCC website⁴.

This consultation document is seeking views on a limited number of amendments to the TMAD, MAM, and MSM related to process improvement.

2. Changes to the TMAD

This version of the TMAD has a change to Clause 4.8 (a) in the document when compared to the current version to shorten the notification period for Daily Migration Demand Values. During engagement with Energy Suppliers on possible improvements to the migration regime, concerns regarding the current four weeks ahead demand requirement were raised. On this basis, DCC is proposing to reduce the timeline for submission of Daily Migration Demand values by two weeks as per Figure 1 in order to improve efficiency in the forecasts / demand allocation process. Given this is a change in the business process, DCC plans to engage on a bilateral basis with each of the Energy Supplier presently submitting Daily Migration Demand to ensure they comprehend the implementation of this change.

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

² <u>https://www.smartdcc.co.uk/document-centre/tmad-child-documents/</u>

³ <u>https://www.smartdcc.co.uk/document-centre/tmad-child-documents/migration-scaling-methodology/</u>

⁴ <u>https://www.smartdcc.co.uk/document-centre/tmad-child-documents/migration-authorisation-mechanism/</u>

There are also minor changes to the TMAD to allow the four TMAD Child Documents to be amended for minor changes without prior consultation as the overhead of consultation is an unnecessary burden on both DCC and potential respondents.



Key: DR - Demand requirement / MA - Migration Authorisation / DC - Demand Commitment.

Figure 1 – Daily Migration Demand – Reduced Timeline

The key proposed changes to the TMAD are set out in Table 1 below.

No	TMAD Reference	Description and Rationale for Change
1.	Clause 4.8 (a) Clause 4.8 (b)	Change to reduce the timeline for data submission of Daily Migration Demand to improve efficiency in the process as per DCC's engagement with Energy Suppliers. Additionally, a change to align the subsequent reporting of the Migration Demand Commitment.
2.	Clause 4.12 (a) Clause 4.13	Change to allow minor updates to the MSM to be published without prior consultation.
3.	Clause 4.43	Change to allow minor updates to the MAM to be published without prior consultation.
4.	Clause 4.45 (a)	Change to allow minor updates to the MRR to be published without prior consultation.
5.	Clause 8.10 to 8.10A	Change to allow minor updates to the MEHRS to be published without prior consultation.

Table 1 - Overview of TMAD Drafting Changes

3. Changes to the MSM

DCC is proposing a number of changes to the current version of the MSM including a few minor drafting changes that are required to align the MSM to the TMAD and to provide clarity on the supporting files.

The key proposed changes to the MSM are set out in Table 2 below. There are also a few minor drafting changes within the legal drafting to amend typographical errors and improve clarity.

No	MSM Reference	Description and Rationale for Change
1.	Section 7 2 nd Paragraph	Change the submission time to 1500 on a Monday consistent with the proposed TMAD improvements set out above in Table 1. A sentence was added to confirm the current operational practice where more than one file is provided, DCC will use the last file received before the submission deadline.
2.	Section 7 3 rd & 4 th Paragraphs	The default rule has been changed to zero to align the MSM to the TMAD. This change reflects a recent change to Clause 4.9 of the TMAD, which amended the default to be zero i.e. where no value for Daily Migration Demand is provided, DCC shall use a default value of zero.
3.	Section 8 1 st Paragraph	Amended to be clear that the latest version of the Microsoft Excel Workbook for provision of demand data is available on the DCC website.
4.	Section 8 Figure 6	Added npower as a SMETS1 SMSO as this was omitted in error.
5.	Section 8 Final Paragraph	Amended to be clear that the latest version of the example CSV file for provision of demand data is available on the DCC website.
6.	Section 9 Final Paragraph	Amended to be clear that the latest version of the example CSV file for provision of demand data is available on the DCC website.
7.	Excel File	Added npower as a SMETS1 SMSO as this was omitted in error.

Table 2 - Overview of MSM Drafting Changes

Improvement Q2	Do you have any comments on changes to the MSM within the scope of this consultation?
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4. Changes to the MAM

This version of the MAM has limited changes in the document when compared to the current version. These changes provide clarity on the supporting files

The key proposed changes to the MAM are set out in Table 3Table 2 below. There are also a few minor drafting changes within the legal drafting to amend typographical errors and improve clarity.

No	MAM Reference	Description and Rationale for Change
1.	Section 7.5.2 Section 7.5.4	Update made to the Dormant Meter Migration Schedule (DMMS) Template (new v0.7) to remove the option to generate a password file by the Energy Suppliers to improve efficiency within the process. Minor drafting changes to align to the revised password approach.
2.	Excel files	Amended the Visual Basic for Applications (VBA) code contained within the SMETS1 Migration Authorisation Template to allow Energy Suppliers to submit a single Migration Authorisation for their SMETS1 Installations. Currently when the template is used to generate a Migration Authorisation file a number of variables within the VBA limit the number of rows in the file to 32,767.

Table 3 - Overview of MAM Drafting Changes

Improvement	Do you have any comments on changes to the MAM within the scope of this
Q3	consultation?

5. Next Steps

Following the closure of this consultation, DCC will take into account respondents' views, and, subject to the consultation responses received:

- submit to the Department for Business, Energy and Industrial Strategy (BEIS) an amended version of the TMAD that it considers suitable for re-designation into the Smart Energy Code (SEC) by the Secretary of State; and
- publish an updated MAM and MSM consistent with the TMAD requirements.

DCC is aiming to conclude on this consultation no later than 18 June 2021. Given the differing regulatory requirements, DCC plans to:

- provide a conclusions report to BEIS related to the TMAD re-designation;
- publish a separate report covering DCC's conclusions on the MAM and MSM; and
- publish the MAM and MSM with an effective date of 2 July 2021, in line with the 14 day notice period for these documents (Clause 4.12 of the TMAD for the MSM / Clause 4.41 of the TMAD for the MAM).

DCC has discussed the re-designation of the TMAD with BEIS and it is proposed that, subject to timely receipt of DCC's report, copies of relevant stakeholder responses to this consultation, and the outcome of the consultation exercise, BEIS will re-designate the TMAD on 2 July 2021 or as soon as reasonably practicable within one month.

In order to expedite the re-designation of the TMAD, DCC is also seeking views on behalf of BEIS on the proposed date for re-designation of the TMAD as well as the draft direction which is presented in Attachment 1 of this consultation document for stakeholder consideration.

Improvement Q4 Do you agree with the proposed re-designation date of 2 July 2021 for updates to the TMAD related to the migration process improvements?

6. How to Respond

Please provide responses in the attached template by 1600 on 10 June 2021 to DCC at <u>consultations@smartdcc.co.uk</u>. Your response may be submitted in PDF or similar format rather than Microsoft Word format if preferred.

Consultation responses may be published on our website <u>www.smartdcc.co.uk</u>. 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 the Department for Business, Energy and Industrial Strategy (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 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 <u>consultations@smartdcc.co.uk</u>.

7. Attachments

Attachment	Title
1	Draft Notification Text on Transition and Migration Approach Document
2	Response Template
3	Transition and Migration Approach Document v12.z draft (change marked against V12.0)

Attachment	Title
4	Migration Scaling Methodology V4.1 draft (change marked against V4.0) SMETS1 Migration Demand Template v1.1.xlsm
5	Migration Authorisation Mechanism V4.1 draft (change marked against V4.0) SMETS1 Migration Authorisation v0.7.xlsm DMMS_template v0.7.xlsm

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.