

Regulatory Changes for SMETS1 Uplift 1.1 – Conclusions Document

DCC Conclusions and Report to Secretary of State on changes to the SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD), SMETS1 Transition and Migration Approach Document (TMAD) and SMETS 1 Supporting Requirements (S1SR) to support the SMETS1 Uplift 1.1

Date: 31 March 2020

Classification: DCC Public

Filename: CON_Uplift_1_1_Conclusions_ISSUED

1 Contents

- 1 Introduction and Context.....3**
- 2 Stakeholder Engagement3**
 - 2.1 Consultation Questions4
 - 2.2 Respondents5
- 3 Analysis of Responses.....5**
 - 3.1 Auxiliary Load Tariff Schedules (Uplift 1.1 Q1)5
 - 3.2 Removing Split Supply Validation (Uplift 1.1 Q2).....6
 - 3.3 Migration File Sequencing Validation (Uplift 1.1 Q3)8
 - 3.4 Gas Meter and Gas Proxy Function (GPF) Serial Number Misalignment (Uplift 1.1 Q4).....8
 - 3.5 SMETS1 Uplift Testing (Uplift 1.1 Q5)9
 - 3.6 Manifest Errors on the EPCL (Uplift 1.1 Q6).....11
 - 3.7 SIM Roaming Obligation (Uplift 1.1 Q7)11
 - 3.8 Secretary of State Regulatory Change (Uplift 1.1 Q8)12
 - 3.9 DCC Regulatory Change (Uplift 1.1 Q9).....12
- 4 Summary of Drafting Changes.....13**
- 5 Conclusions.....13**
 - 5.1 TMAD and S1SR - Conclusions13
 - 5.2 SMETS1 SVTAD - Conclusions14
- 6 Next Steps.....15**
 - 6.1 TMAD and S1SR - Next Steps15
 - 6.2 SMETS1 SVTAD - Next Steps15
- 7 Attachments15**
 - Attachment 117
 - Attachment 218

1 Introduction and Context

The detailed technical and procedural requirements of the migration approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD). The SMETS 1 Supporting Requirements (S1SR) describes supplementary rules for how the DCC will process SMETS1 Service Requests / Service Reference Variants (SR / SRV) and includes the accommodation of behaviours that are specific to particular SMETS1 Device Models. The SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) sets out the rights and obligations for a range of SMETS1 testing matters including System Integration Testing (SIT) and the Device Model Combination Testing (DMCT) Process and also provides the framework for the Migration Testing Approach Document (MTAD) which sets out the rights and obligations for Migration Testing (MT).

These documents are included in the Smart Energy Code¹ (SEC) as appendices as follows:

- SMETS1 SVTAD is Appendix AK and the latest version was included in the SEC on 6 February 2020;
- TMAD is Appendix AL and the latest version was included in the SEC on 13 March 2020; and
- S1SR is Appendix AM and the latest version was included in the SEC on 13 December 2019.

On 24 February 2020, DCC issued a consultation² that sought views on a few changes to the SMETS1 solution that impact the TMAD and S1SR. Also, amendments to the SMETS1 SVTAD were proposed related to how the changes would be tested as a SMETS1 Uplift.

This document considers responses to this consultation consistent with the regulatory requirements for revising the TMAD, S1SR, and SMETS1 SVTAD.

2 Stakeholder Engagement

This section details DCC's stakeholder engagement that has taken place in relation to the revisions to the TMAD, S1SR, and SMETS1 SVTAD.

On Monday 24 February 2020, DCC published the consultation document titled '[Consultation on regulatory changes for SMETS1 Uplift 1.1](#)' on the DCC Website and DCC's Service Desk also emailed stakeholders to notify them of its publication.

The scope of the consultation covered the following matters:

- [SMETS1 Transition and Migration Approach Document AL V1.5](#);
- [SMETS 1 Supporting Requirements AM V1.2](#) (including [ANNEX A - DEVICE MODEL VARIATIONS TO EQUIVALENT STEPS MATRIX \(DMVES MATRIX\)](#));
- [SEC Variation Testing Approach Document for SMETS1 Services AK V1.6](#);
- draft text for the Secretary of State's direction for the re-designation of the TMAD and S1SR;

¹ The current SEC is available via the SECAS website - www.smartenergycodecompany.co.uk/the-smart-energy-code-2/.

² <https://www.smartdcc.co.uk/customer-hub/consultations/consultation-on-regulatory-changes-for-smets1-uplift-11/>

- the envisaged decision date for the Secretary of State to re-designate the TMAD and S1SR;
- draft text for DCC’s notification of the amendment for the SMETS1 SVTAD; and
- the envisaged decision date for DCC to notify an amendment for the SMETS1 SVTAD.

Stakeholders were invited to respond by 16:00 on Friday 13 March 2020 using a response template that was provided as part of the consultation.

During the consultation period DCC presented an overview of the consultation with a focus on the changes to the SMETS1 SVTAD to the Testing Advisory Group at TAG64 on Wednesday 26 February 2020; there were no concerns raised by the TAG regarding the changes to the SMETS1 SVTAD. There was one suggested amendment to the SMETS1 SVTAD made by a member of the TAG, to improve the legal drafting, which has been made by DCC in the concluded version.

2.1 Consultation Questions

The [SMETS1 Uplift 1.1 Response Template](#) presented nine questions covering the consultation as presented in Figure 1.

Figure 1 – SMETS1 Uplift 1.1 Questions

Number	Question
Uplift 1.1 Q1	Do you have any views on the proposed changes to support installations where there is a switch that is controlled by the tariff calendar on the ESME Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Uplift 1.1 Q2	Do you have any views on the proposal regarding removing the step that would not include Supplier Certificates in the processing of the Migration where the Certificates do not correspond to the same SEC Party ID and the various other changes to accommodate affiliate Responsible Suppliers? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Uplift 1.1 Q3	Do you have any views on the proposal to amend the validation algorithm for migration file sequencing? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Uplift 1.1 Q4	Do you have any views on the proposals to accommodate changes in the process to address misalignment between the Gas Meter Serial Number and Gas Proxy Function (GPF)? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

Uplift 1.1 Q5	Do you have any views on the proposals for SMETS1 Uplift Testing? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Uplift 1.1 Q6	Do you have any views on the proposals for correcting manifest error in relation to entries on the EPCL? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Uplift 1.1 Q7	Do you have any views on the proposals related to SIM roaming? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
Uplift 1.1 Q8	Do you agree with the proposed re-designation date of 5 May 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for each of the updates to the TMAD and the S1SR using draft notification at Attachment 1?
Uplift 1.1 Q9	Do you agree with the proposed amendment date of 3 April 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the SMETS1 SVTAD and the MTAD using draft notification at Attachment 2?

2.2 Respondents

DCC received six written responses to the SMETS1 Uplift 1.1 consultation. A copy of every submission to the consultation was provided to the Secretary of State once the consultation had closed.

3 Analysis of Responses

DCC has analysed the feedback provided by each respondent. Subject matter experts within DCC have reviewed every response. DCC has structured the analysis of responses by question. Thus, this section presents DCC's analysis by question in several separate subsections; with each structured as:

- an overview of the responses on the topic; and
- areas where DCC disagrees with the view presented by respondents, as the regulation requirements require DCC to report on this.

3.1 Auxiliary Load Tariff Schedules (Uplift 1.1 Q1)

DCC sought views on changes related to auxiliary load tariff schedules asking “*Uplift 1.1 Q1 Do you have any views on the proposed changes to support installations where there is a switch that is controlled by the tariff calendar on the ESME Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.*”.

3.1.1 Respondent View

DCC received a response from all six respondents on the proposal for auxiliary load tariff schedules:

- four respondents supported the proposal;
- one respondent supported the proposal but expressed some concerns;
- one respondent made observations without expressing an explicit view to either support or reject the proposal; and
- none of the respondents objected to the proposal.

One Respondent highlighted that (as a Responsible Supplier) they have a number of customers with dormant meters in the MOC (MDS) cohort, and were seeking assurance on the steps that DCC plans to take prior to Uplift 1.1 going live. In March 2020, DCC wrote to all Supplier Parties regarding auxiliary load control deployments at sites containing dormant meters within the MOC (MDS) cohort. DCC's letter outlined the nature of the problem, setting out how DCC proposes to work bilaterally with each Supplier Party to the extent that they are a Responsible Supplier for a dormant meter to identify sites that are likely to be impacted by this matter. DCC also confirmed that, until the Uplift 1.1. changes to address this matter have been implemented for each S1SP, DCC only intends to proceed with the migration of any site containing dormant meters where DCC has confidence that auxiliary load control has not been deployed. In addition, DCC has highlighted this matter to Responsible Suppliers for sites containing active meters within the MOC (MDS) cohort; thereby allowing those Responsible Suppliers to factor this risk into their plans to migrate sites containing active meters within the MOC (MDS) cohort.

One respondent expressed concern that the auxiliary load tariff schedules matters have not yet been implemented. DCC understands these concerns and is working with its Service Providers to deliver this functionality for all cohorts where it's needed, and Uplift 1.1 is on track for delivery for IOC & MOC (MDS) in early May. The auxiliary load control requirements are also expected to be deployed as part of the MOC (Secure) service but is not considered to be a requirement for FOC.

One respondent queried how auxiliary load control operation will be impacted by 'change of tenant' or 'change of supplier' events as well as other transitional events that may adjust the configuration of the ESME other than the removal/modification of the multi-rate tariff calendar. DCC confirms that if a tariff is changed by the Responsible Supplier as a result of a 'change of tenant' or 'change of supplier' then the auxiliary load tariff schedule, will be based on the new tariff. Thus, in all cases, Responsible Suppliers will need to be mindful of the onsite conditions for their customers and set tariff structures accordingly. The tools to facilitate this are available within the set of SRVs currently available.

3.1.2 Areas of Disagreement

There were no areas of disagreement.

3.2 Removing Split Supply Validation (Uplift 1.1 Q2)

DCC sought views on removing the split supply validation asking "*Uplift 1.1 Q2 Do you have any views on the proposal regarding removing the step that would not include Supplier Certificates in the processing of the Migration where the Certificates do not correspond to the*

same SEC Party ID and the various other changes to accommodate affiliate Responsible Suppliers? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”.

3.2.1 Respondent View

DCC received a response from all six respondents on the proposal to removed split supply validation:

- four respondents supported the proposal
- two respondents made observations without expressing an explicit view to either support or reject the proposal; and
- none of the respondents objected to the proposal.

One respondent sought clarity on whether DCC is able to apply Energy Supplier certificates in a ‘true’ split supply scenario i.e. where there are two non-Affiliated Responsible Suppliers. DCC can confirm that Energy Supplier certificates will be applied during commissioning by DCC for all scenarios where a certificate is provided (irrespective of whether the Responsible Suppliers are Affiliated or not. In the circumstance of a ‘true’ split supply scenario, DCC will only migrate the SMETS1 Installation once authorisation is provided by both energy suppliers. This respondent also suggested that the provision of a combined Migration Authorisation should also be available in a ‘true’ split supply scenario.

One respondent queried how legal drafting explicitly states that the Affiliated Electricity Supplier can specify the Gas Supplier’s certificate ID as it isn’t explicitly covered by the definition of Migration Authorisation; DCC concurs and has amended Clause 4.38 of the TMAD to address this matter. This respondent also suggested that DCC expands the legal drafting to include a definition of ‘Affiliated Responsible Suppliers’ in the TMAD.

One respondent asked DCC to confirm how ‘Affiliates’ will be determined. DCC can confirm that the Supplier Party mapping used will be consistent with the existing SMETS2 arrangements.

Two respondents expressed concern that the split supply arrangements for MOC (Secure) and FOC are not within the scope of SMETS1 Uplift 1.1. DCC understands these concerns and is working with its Service Providers to deliver this functionality for all cohorts. DCC is planning to extend these changes for split supply to MOC (Secure) and FOC when those operating capabilities go live, subject to impact assessments being completed and accepted.

Two respondents sought clarity on the approach to ‘mixed’ scenarios (given the drafting changes) to confirm that the Responsible Supplier for a Dormant Meter in a ‘mixed’ scenario, will not receive a Dormant Migration Schedule and instead will only receive MRR01 and N55. DCC can confirm, that for an installation where there is a Dormant Meter and an Active Meter, the Responsible Supplier for the Dormant Meter will not receive a Dormant Migration Schedule, and will only receive an MRR01 report and N55 alert, post migration. The Responsible Supplier for the Active Meter in a mixed SMETS1 Installation should only provide certificates for the Active Meter in the Migration Authorisation. The Requesting Party will identify the associated Dormant Meter and include the details of both Devices in the Migration Common File, but as no certificates have been received for the Dormant Device, only certificate details for the Active Device will be present in the Migration Common File (MCF). However, should the Responsible Suppliers in a ‘mixed’ scenario be affiliates then

certificates for both meters can be provided in the Migration Authorisation and the Requesting Party will include both certificates within the MCF.

3.2.2 Areas of Disagreement

DCC does not consider it would be prudent for the split supply arrangements to be expanded to cover a 'true' split supply scenario as proposed by one respondent given the need to validate the approvals from separate firms would introduce inefficiencies with the operational arrangement supporting migration. DCC notes that the requirement to improve the split supply scenario was raised by Energy Suppliers that operate with separate SEC Party IDs for their Gas Supply business and Electricity Supply business whilst within the same corporate group and there was no business requirement for this change to be adopted in the circumstances that the Gas Supplier and Electricity Supplier aren't an affiliate of each other.

DCC does not consider it is appropriate to expand the legal drafting to include a definition of 'Affiliated Responsible Suppliers' in the TMAD; as the drafting is based on the main SEC definition of Affiliate and thus an expanded definition is unnecessary. Furthermore, a number of minor legal drafting changes have been made to improve the clarity of the affiliate arrangements in the TMAD.

3.3 Migration File Sequencing Validation (Uplift 1.1 Q3)

DCC sought views on improvements to the regime for the sequencing validation of migration files asking "*Uplift 1.1 Q3 Do you have any views on the proposal to amend the validation algorithm for migration file sequencing? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.*".

3.3.1 Respondent View

DCC received a supportive response from all six respondents on the proposal to improve the regime for the sequencing validation of migration files.

One respondent queried whether the changes would lead to migrations taking up to 60 days related to a defect raised in Migration DUST. DCC considers that this change will not result in Migrations taking longer and will improve migration rates by removing the issues with file sequencing currently experienced by DCC.

Two respondents expressed concern that the improved sequencing validation of migration files for MOC (Secure) and FOC are not within the scope of SMETS1 Uplift 1.1. DCC understands these concerns and is working with its Service Providers to deliver this functionality for all cohorts. DCC is planning to extend these changes for split supply to MOC (Secure) and FOC when those operating capabilities go live, subject to impact assessments being completed and accepted.

3.3.2 Areas of Disagreement

There were no areas of disagreement.

3.4 Gas Meter and Gas Proxy Function (GPF) Serial Number Misalignment (Uplift 1.1 Q4)

DCC sought views on gas meter and GPF misalignment asking "*Uplift 1.1 Q4 Do you have any views on the proposals to accommodate changes in the process to address misalignment between the Gas Meter Serial Number and Gas Proxy Function (GPF)? Do*

you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”.

3.4.1 Respondent View

DCC received a supportive response from all six respondents on the proposal to amend the migration regime to address any misalignment of the Gas Meter Serial Number and Gas Proxy Function (GPF).

One respondent sought confirmation that there was no impact (resulting from the change in processing related to misalignment between the Gas Meter Serial Number and the GPF) on Energy Suppliers receiving alerts. DCC can confirm that this is an S1SP change only and all alerts will continue to identify Devices via their Device IDs (GUIDs) and not Gas Meter Serial Number.

One respondent queried the extent of data mismatch for Aclara Gas Meters as the validation check will remain for these Devices because the Gas Meter Serial Number is used for some elements of alert processing for Aclara Gas Meters. The respondent suggested that an industry data cleansing exercise may be appropriate in order to maximise enrolment rate and avoid the unnecessary replacement. DCC notes these concerns and will monitor this situation for Aclara DMCs and consider options for further action if appropriate.

One respondent noted that MOC (Secure) and FOC are not within the scope of SMETS1 Uplift 1.1 and sought confirmation that DCC will investigate whether the change for misalignment between the Gas Meter Serial Number and the GPF is needed for those capability releases. DCC can confirm that it is pursuing such investigations and will consider what steps are appropriate for MOC (Secure) and FOC should the need arise.

3.4.2 Areas of Disagreement

There were no areas of disagreement.

3.5 SMETS1 Uplift Testing (Uplift 1.1 Q5)

DCC sought views on the approach to SMETS1 Uplift Testing asking “*Uplift 1.1 Q5 Do you have any views on the proposals for SMETS1 Uplift Testing? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”.*

3.5.1 Respondent View

DCC received a response from all six respondents on the proposal to include provisions for SMETS1 Uplift Testing in the SMETS1 SVTAD:

- five respondents supported the proposal;
- one respondent made observations without expressing an explicit view to either support or reject the proposal; and
- none of the respondents objected to the proposal.

Two respondents sought clarity on the extent of any change that would constitute a SMETS1 Uplift. DCC outlined in the consultation document that the scope of a ‘SMETS1 Uplift’ is a change needed to the DCC’s systems related to SEC amendments for SMETS1 that provide

incremental improvement rather than MT or SIT as currently provided for to test new functionality or DMCT to support the operation of new DMCs. This definition means that it is an amendment to the SEC that results in a change to the Modified DCC Total System and thus is different from a maintenance release, which doesn't have an accompanying amendment to the SEC. Furthermore, any SMETS1 Uplift changes are delivered via a BEIS decision under transitional governance (i.e. BEIS powers to amend SEC) rather than the normal SEC modification process. DCC expects that BEIS will consider prioritisation / timelines as it deems appropriate. The scope of testing for the SMETS1 Uplift 1.1 is covered in the SMETS1 Uplift 1.1 DCC Testing Approach document, which has been presented to the TAG. This outlines the other fixes within the release in addition to the SMETS Uplift 1.1 amendments and confirms that there are no mandatory user testing requirements for SMETS1 Uplift 1.1.

One respondent requested that entries are considered on a case by case basis where testing issues arise with referral back to TAG. In relation to SMETS1 Uplift 1.1, another respondent queried the extent of testing overlap with existing releases. The approach to these two matters is covered by the relevant SMETS1 Uplift DCC Testing Approach Document. DCC are discussing with the TAG and stakeholders regarding a series of 'redline' rules that future releases will comply with, one of which includes early engagement with stakeholders / the TAG regarding the testing environments and governance that DCC intends to employ.

One respondent expressed the view that Elster/CGI should be included in overall testing related to split supply for SMETS1 Uplift 1.1.

One respondent objected to the SMETS1 Uplift 1.1 being initially available for user testing in UIT-A as they considered that UIT-B was the appropriate stream for testing these fixes.

One respondent sought assurance that the approach to testing (including scope, environments, defect threshold, etc) and the completion are agreed for every SMETS1 Uplift via the TAG, and also that all mandatory user testing is subject to further consultation and agreement with the Industry. DCC agrees that it is entirely appropriate for (i) TAG engagement on approach / completion and (ii) consultation on matters related to mandatory user testing, as provided for within the existing legal drafting.

3.5.2 Areas of Disagreement

With regard to the suggested extension of testing to include Elster/CGI for the split supply amendment, DCC is testing using an Aclara DMC and an Elster Honeywell (MDS) DMC, which is deemed sufficient as this fix is not Device specific. Thus, DCC does not believe testing should be extended in this area. Furthermore, DCC notes that the proposed testing for each of the amendments is outlined in the SMETS1 Uplift DCC Testing Approach Document for Uplift 1.1 (including the DMCs selected for testing each fix with associated rationale) which was agreed by the TAG.

DCC considers the approach to user testing is appropriate. The SMETS1 Uplift DCC Testing Approach Document for Uplift 1.1 has been updated to state that although user testing is not considered mandatory for these amendments, a five day window will be provided for user testing in UIT-A, and the DCC will make best efforts to support users with this testing. Any issues found in this window will be factored into the BEIS decision regarding designation of the SEC changes. Thus, Testing Participants have the opportunity to test in UIT-A and DCC is supporting the respondent that raised the objection with this testing. Furthermore, there will also be the opportunity to test in UIT-B consistent with SMETS2; the changes will be included in UIT-B as soon as reasonably practical.

3.6 Manifest Errors on the EPCL (Uplift 1.1 Q6)

DCC sought views on provisions to allow manifest errors on the EPCL to be addressed asking *“Uplift 1.1 Q6 Do you have any views on the proposals for correcting manifest error in relation to entries on the EPCL? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”*.

3.6.1 Respondent View

DCC received a supportive response from all six respondents on the proposal to allow manifest errors on the EPCL to be corrected.

Four respondents highlighted the importance that any corrections are communicated to stakeholders in a timely fashion. DCC welcomes this suggestion; Clause 3.7 has been amended to obligate DCC to promptly notify stakeholders if a manifest error is corrected.

3.6.2 Areas of Disagreement

There were no areas of disagreement.

3.7 SIM Roaming Obligation (Uplift 1.1 Q7)

DCC sought views on the proposal for an obligation on DCC related to SIM roaming asking *“Uplift 1.1 Q7 Do you have any views on the proposals related to SIM roaming? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”*.

3.7.1 Respondent View

DCC received a response from all six respondents on the proposal related to SIM roaming:

- five respondents supported the proposal;
- one respondent made observations without expressing an explicit view to either support or reject the proposal; and
- none of the respondents objected to the proposal.

Two respondents sought confirmation that the legal drafting reflected the intent of the proposed change related to SIM roaming. DCC can confirm that this is the case. It will be taking the appropriate steps so that migrated SIMs can communicate with DCC Live Systems. The drafting change ensures that the SIM is migrated to the correct account as without this, WAN communication might be affected.

One respondent queried whether this SIM roaming issue was relevant to MOC (Secure). DCC can confirm that the SIM's roaming ability within MOC (Secure) is not amended by the Migration Process as there are no CSP related changes, which is different to other capability releases.

3.7.2 Areas of Disagreement

There were no areas of disagreement.

3.8 Secretary of State Regulatory Change (Uplift 1.1 Q8)

DCC sought views on the Secretary of State re-designating the TMAD and S1SR asking “*Uplift 1.1 Q8 Do you agree with the proposed re-designation date of 5 May 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for each of the updates to the TMAD and the S1SR using draft notification at Attachment 1?*”.

3.8.1 Respondent View

DCC received a supportive response from all six respondents on the proposal for the Secretary of State to re-designate the TMAD and S1SR.

One respondent queried whether any slippage to parts of Uplift 1.1 was currently expected. At the point of preparing this conclusions document, DCC can confirm that it does not expect any material slippage to any element with Uplift 1.1 but will continue to keep stakeholders advised on progress using existing communications channels.

One respondent sought assurance that there was sufficient time for DCC to adequately review the responses. DCC accepts that the timetable may appear limited, however, in setting the schedule DCC considered that it was appropriate given the limited nature of the changes proposed and an expectation that there would not be major objections from interested stakeholders. The nature of responses received by DCC is in line with this expectation. Thus, DCC considers it appropriate to conclude promptly consistent with the proposal set out in the consultation document.

3.8.2 Areas of Disagreement

There were no areas of disagreement.

3.9 DCC Regulatory Change (Uplift 1.1 Q9)

DCC sought views on DCC modifying the SMETS1 SVTAD asking “*Uplift 1.1 Q9 Do you agree with the proposed amendment date of 3 April 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the SMETS1 SVTAD and the MTAD³ using draft notification at Attachment 2?*”.

3.9.1 Respondent View

DCC received a supportive response from all six respondents on the proposal for DCC to modify the SMETS1 SVTAD.

One respondent expressed concerned that there was limited time for end-to-end User Testing which gives rise to an element of risk. In order to mitigate this risk, DCC agreed with the TAG to provide a 5 day window for User Testing in UIT-A for before SMETS1 Uplift 1.1 go-live which BEIS will take into account in arriving at a re-designation decision.

3.9.2 Areas of Disagreement

There were no areas of disagreement.

³ DCC notes reference to MTAD in question was a typographical error as the MTAD was in the scope of this consultation.

4 Summary of Drafting Changes

The consultation process gave rise to a limited number of changes to the TMAD, S1SR, and SMETS1 SVTAD (compared to the consultation versions) which are detailed in this section. There are a few minor drafting changes within the legal drafting to amend for typographical errors and improve clarity. Additionally, an overview of key changes to the TMAD, S1SR, and SMETS1 SVTAD (Figure 2) are set out below for information. Please note that the Clause references in Figure 2 are based on conclusion versions attached to this document.

Figure 2 – Changes to the Legal Drafting

Drafting Reference	Description and Rationale for change
SMETS1 SVTAD Clause 1.3	'Mandated' added to the definition of SMETS1 Uplift User Testing Document based on a request by a TAG member.
SMETS1 SVTAD Clause 1.3	'SMETS1 Uplift Mandated User Testing' added as a new definition as used in the definition of 'SMETS1 Uplift Testing' but not defined.
TMAD Clause 3.7	Requirement on DCC to report promptly if manifest errors are corrected as per a consultation response received.
TMAD Clause 4.38	Additional text to explicitly state that an Electricity Supplier can specify the Gas Supplier's certificate ID (where there are Affiliated) as per a consultation response received.
DMVES	The 'Aclara - Release 5.3.9' details have been removed from the DMVES. These were included in error as this information does not relate to an entry on the EPCL and will be added once the Aclara has completed DMCT. Also, a typo to correct the 'Honeywell - Release 8.0.13' title has been made.

5 Conclusions

Given the differing regulatory requirements, the conclusions for the TMAD and S1SR are presented separately to those for the SMETS1 SVTAD.

5.1 TMAD and S1SR - Conclusions

DCC is confident that the revised draft TMAD and S1SR, submitted to the Secretary of State reflects the requirements for document submission.

DCC is of the opinion that it has had appropriate consultation with industry regarding these changes to the TMAD and S1SR.

DCC is confident that the TMAD and S1SR submitted to the Secretary of State reflect the requirements for document submission. DCC has, where necessary, addressed the comments that have been received from industry and where appropriate has sought

additional feedback from respondents. DCC does not believe that the views expressed result in fundamental amendments to the TMAD and S1SR and as such further consultation is neither necessary nor appropriate.

It is DCC's view that it has met its SEC obligation to consult with parties and to address the points raised and identify those comments that have not been resolved. DCC is of the view that it has met its regulatory obligation as set out in the SEC.

The TMAD and S1SR revisions are in line with the overall solution design for the SMETS1 Service and other relevant documents.

DCC considers that:

- the revised TMAD and S1SR are defined to a sufficient level of detail for re-designation into the SEC;
- the revised TMAD and S1SR provide an overarching framework which sets out clearly and unambiguously parties' rights and obligations which are consistent / and aligned with the rest of the SEC requirements in relation to SMETS1 Services; and
- the revised TMAD and S1SR are materially complete, and their content is technically accurate.

In summary, DCC considers that the revised TMAD and S1SR are fit for purpose.

5.2 SMETS1 SVTAD - Conclusions

DCC intends to amend the SMETS1 SVTAD with the changes as attached to this conclusions document given the responses received.

Consistent with the requirements set out in Clause 4.2 of the SMETS1 SVTAD, DCC has undertaken appropriate consultation with stakeholders in relation to the proposed amendments to the SMETS1 SVTAD.

DCC is confident that the SMETS1 SVTAD submitted to the Secretary of State reflects the requirements for document submission. DCC has, where necessary, addressed the comments that have been received from industry and where appropriate has sought additional feedback from respondents. DCC does not believe that the views expressed result in fundamental amendments to the SMETS1 SVTAD and as such further consultation is neither necessary nor appropriate.

It is DCC's view that it has met its SEC obligation to consult with parties and to address the points raised and identify those comments that have not been resolved. DCC is of the view that it has met its regulatory obligation as set out in the SEC.

The revised SMETS1 SVTAD is in line with the overall testing design for the SMETS1 Service and other relevant documents.

DCC considers that:

- the revised SMETS1 SVTAD is defined to a sufficient level of detail for amendment into the SEC by DCC;

- the revised SMETS1 SVTAD provides an overarching framework which sets out clearly and unambiguously parties' rights and obligations which are consistent / and aligned with the rest of the SEC requirements in relation to SMETS1 Services; and
- the revised SMETS1 SVTAD is materially complete, and the content is technically accurate.

In summary, DCC considers that the SMETS1 SVTAD is fit for purpose.

6 Next Steps

DCC submitted this conclusions report (along with the updated TMAD, S1SR and SMETS1 SVTAD) to the Secretary of State on 31 March 2020.

Given the differing regulatory requirements, this section presents the next steps for the TMAD and S1SR separately from those for the SMETS1 SVTAD.

6.1 TMAD and S1SR - Next Steps

Following the submission of TMAD and S1SR to the Secretary of State, DCC expects the Secretary of State to make a decision on whether and when to re-designate⁴ the revised TMAD and S1SR into the regulatory framework utilising the draft direction text as presented in Attachment 1 of this conclusions report.

6.2 SMETS1 SVTAD - Next Steps

DCC considers that, having followed the process in Clause 4.2 of the SMETS1 SVTAD, it is appropriate to amend the SMETS1 SVTAD. DCC will publish its conclusions report on the DCC Website and notify SEC Parties.

Subject to the Secretary of State not directing otherwise, DCC will issue a notice to modify the SMETS1 SVTAD on 3 April 2020 consistent with Attachment 2 of this conclusions report. DCC will notify the SEC Administrator and an updated version of the SEC to reflect these changes will be available on the SEC website in due course.

7 Attachments

Figure 3 details the attachments to this conclusions document.

Figure 3 – Attachments

Num / Type	Description
1 Direction	Draft Direction Text for re-designating the TMAD and S1SR
2 Notification	Draft Notification Text for modifying the SMETS1 SVTAD
3 SMETS1 SVTAD	SEC Variation Testing Approach Document for SMETS1 Services Version: AK 3.0 draft (clean)

⁴ NB Based on this consultation, the earliest date that the TMAD and S1SR could be re-designated is 5 May 2020.

Num / Type	Description
4 SMETS1 SVTAD	SEC Variation Testing Approach Document for SMETS1 Services Version: AK 3.0 draft (change marked against the SMETS1 Uplift 1.1 consultation Version 1.6)
5 SMETS1 SVTAD	SEC Variation Testing Approach Document for SMETS1 Services Version: AK 3.0 draft (change marked against the current version - V2.0)
6 TMAD	SMETS1 Transition and Migration Approach Document Version: AL 4.0 draft (clean)
7 TMAD	SMETS1 Transition and Migration Approach Document Version: AL 4.0 draft (change marked against the SMETS1 Uplift 1.1 consultation Version: AL 1.5)
8 TMAD	SMETS1 Transition and Migration Approach Document Version: AL 4.0 (change marked against the current version AL 3.0)
9 S1SR	SMETS 1 Supporting Requirements Version: AM 3.0 draft (clean)
10 S1SR	SMETS 1 Supporting Requirements Version: AM 3.0 draft (change marked against the SMETS1 Uplift 1.1 consultation AM 1.2)
11 S1SR	SMETS 1 Supporting Requirements Version: AM 3.0 draft (change marked against the current version AM 2.0)
12 DMVES	SMETS 1 Supporting Requirements Version: AM 3.0 draft - ANNEX A - DEVICE MODEL VARIATIONS TO EQUIVALENT STEPS MATRIX (DMVES MATRIX)

Attachment 1

This attachment contains the text that Secretary of State plans to use for direction of changes to the TMAD and S1SR.

TMAD and S1SR Draft Direction Text

This direction is made for the purposes of the smart meter communication 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 MMM YYYY], the SMETS1 Transition and Migration Approach Document previously designated and incorporated into the SEC as Appendix AL and the SMETS 1 Supporting Requirements previously designated and incorporated into the SEC as Appendix AM are hereby re-designated and incorporated in the form set out in Annex [XX] and Annex [XX] (respectively) to this direction.

For the avoidance of doubt such re-designation of the SMETS1 Transition and Migration Approach Document and the SMETS 1 Supporting Requirements shall be without prejudice to anything done under the DCC Licence or the SEC on or after these documents first being designated, or to the continuing effectiveness of anything done under these documents prior to their re-designation (which shall have effect as if done under the re-designated documents).

This direction is also being notified to the SEC Administrator.

Attachment 2

This attachment contains the text that DCC intend to utilise for modification of the SMETS1 SVTAD. The date for modification of the amended SMETS1 SVTAD will be subject to the Secretary of State not directing otherwise.

SMETS1 SVTAD Draft Notification Text

Words and expressions used in this notification shall be interpreted in accordance with Section A (Definitions and Interpretation) of the SEC.

Pursuant to Clause 4.2 of the SMETS1 SVTAD, DCC notifies that, with effect from 3 April 2020 that the SMETS1 SVTAD is hereby modified and approved pursuant to the SMETS1 SVTAD in the form set out in Annex A of this notification.

For the avoidance of doubt such modification of the SMETS1 SVTAD shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being approved, or to the continuing effectiveness of anything done under this document prior to its modification (which shall have effect as if done under the modified documents).

This notification is also being sent to the SEC Administrator.