Data Communications Company

SMETS1 Transition and Migration Approach Document (TMAD) for Change of Supplier Dormancy (TMAD v4.2 draft)

DCC Conclusions and Report to the Secretary of State on the Change of Supplier Dormancy content of the FOC TMAD consultation.

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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 current TMAD was first designated by the Secretary of State on 14 February 2019 and included in the Smart Energy Code (SEC) from version 6.6 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 FOC which was issued for consultation on 18 December 2019. This consultation also included changes in regards of minimising periods of dormancy in respect of recently dormant devices. Please note that further information relating to the baseline documents are available on the SECAS website in the Testing Baseline Requirements Document. On 6 May 2020, BEIS designated version 4.0 of TMAD which included changes that were necessary for the SMETS1 Uplift1.1.

This 'First Conclusions' document provides DCC's conclusion on the change in regards of minimising periods of dormancy in respect of recently dormant devices that was set out in the FOC TMAD consultation. Please note that this version of TMAD continues to support migration of the IOC and MOC (MDS) cohorts, and hence is considered to cover both IOC, and MOC (MDS).

It is important to note that DCC is separately consulting on notification periods for firmware upgrades - https://www.smartdcc.co.uk/customer-hub/consultations/smets1-device-security-testing-and-notification-period/ - which closes on 15 May 2020.

The changes relating to the early migration of recently dormant meters have been drafted against the version of TMAD was designated by BEIS on 6 May 2020. DCC will be requesting that BEIS designates these changes separately to the FOC changes as it is important that these are designated as soon as possible to limit the period of the loss of smart functionality. Thus, DCC will be providing a 'Second Conclusions' document related to the TMAD for FOC that sets out the changes to TMAD required for FOC based on this consultation. When issuing this 'Second Conclusions' document, DCC will be requesting that BEIS designates a further version of the TMAD at go-live for FOC.

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 in terms of Section X5 of the SEC.

3. Consultation

On 18 December 2019, DCC published the consultation for the FOC TMAD and minimising periods of dormancy change on the DCC Website. DCC's Service Desk also emailed stakeholders to notify of the publication.

Stakeholders were invited to respond by 16:00 on Wednesday 22 January 2020 in a template format that was attached to the consultation.

3.1. Consultation Questions

The consultation presented 3 specific questions as presented in Table 1.

Q Num	Question
TMAD for FOC Q1	Do you have any general comments on the changes to the TMAD within the scope of this consultation?
TMAD for FOC Q2	Do you have any views on DCC's proposals for minimising periods of dormancy in respect of recently dormant devices? Can you identify any other transitional opportunities that could exist to reduce the dormancy period for meters on change of supplier? Please provide a rationale for your views.
TMAD for FOC Q3	Do you have any detailed comments on the changes to the legal drafting in TMAD? Please provide a rationale for your views.

Table 1 – TMAD v1.4 Consultation Questions

This consultation response sets out the responses related to minimising periods of dormancy that relates primarily to Question 2, as well as some responses to Change of Supplier Dormancy that were provided to Question 1. This consultation response only address the comments relating to Change of Supplier Dormancy and accordingly only those comments to Questions 1 and 2 are set out below.

3.2. Respondents

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 regarding Change of Supplier Dormancy as presented within this section of the document.

4.1. General Comments

TMAD Q1: Do you have any general comments on the changes to the TMAD for FOC (MDS)?

Comment	DCC Response

A respondent sought clarification on when the changes for 'Reducing Dormancy' would come into effect.	DCC will be in a position to implement changes to reduce dormancy from 18 May and will request that BEIS designates a version of TMAD incorporating these changes as soon as possible.
A respondent sought to understand how DCC would determine whether a gaining Energy Supplier is SMETS1 ready. Specifically enquiring whether any criteria would be linked to the interoperability checker for Citizen Advice Bureau.	Any criteria that are used by DCC in determining whether a gaining Energy Supplier is SMETS1 ready will not be tied to work being carried on the interoperability checker. DCC will be basing the criteria on the Energy Supplier having passed through eligibility testing and having adopted DUIS v3 in the DCC production environment. DCC has been working with Suppliers to ensure that they have access to the User Integration Testing (UIT) environment where required.
A respondent sought confirmation that DCC would not migrate any sites that would be classed as a Split Supply during a Change of Supplier event. The respondent raised a concern that due to the existing complexity for Split Supply, the co-ordination between the two Energy Suppliers during a Change of Supply event would result in further complications.	With the implementation of Uplift1.1, the issue regarding Split Supply will have been solved and this accordingly is no longer an issue.

Table 2

4.2. Minimising Dormancy (Q2)

TMAD Q2: Do you have any views on DCC's proposals for minimising periods of dormancy in respect of recently dormant devices? Can you identify any other transitional opportunities that could exist to reduce the dormancy period for meters on change of supplier? Please provide a rationale for your views.

Comment	DCC Response
A respondent was of the opinion that DCC should provide the pre-requisites that would enable accelerated migration to take place as well as the assumptions that have been made on the timeframes that are involved.	The reduced timescales proposed are identified as having the potential to reduce dormancy by 7 Working Days. In order to achieve these improvements, the relevant SMSO will need to upgrade the firmware within 5 Working Days and the migration will need to be successful. DCC notes that the requirement for Firmware upgrades within 5 Working Days is reflected in the contractual SLA for each SMSO. DCC will endeavour to meet the 7 Working Day timeframe, but acknowledges that this process might take longer than the specified time. DCC will not migrate dormant SMETS1 devices until a DMC has been added to the EPCL. From that point forward it is DCC's intention to only fast-track newly dormant meters through this process. DCC is basing the timescales for the deployment of new firmware on 5 Working days which is the SLA that has been agreed with each SMSO. DCC will consider a revision of the situation and if necessary, consult on any changes if it becomes apparent that it is not possible to adhere to these timeframes.

A respondent sought information on the underlying principles that will be used to confirm the manner in which equivalence will be determined when DCC proposes to add DMCs to the EPCL on the basis of equivalence and pointed to the fact that a reduction in the period of dormancy could be achieved by increasing the number of EPCL entries.	DCC notes these comments and agrees that increasing the number of EPCL entries should reduce the dormancy period. Clause 20 of the SMETS1 SVTAD sets out the requirements for substantive equivalence within DMCT. Details of the approach to Substantive Equivalence is available here: https://www.smartdcc.co.uk/smart-future/enrolment-and-adoption/dmct-process/.
A respondent disagreed with the proposal related to the reduction in the Change of Supplier check from 7 days to 2 days as well as changing the Dormant Meter Migration Notification from 15 Working Days to 8 Working Days. The respondent was of the opinion that this would have a high impact upon the existing Energy Supplier CoS Loss and Gain process. It expressed the opinion that work should be done to develop prioritisation strategies without changing the regime prescribed in the TMAD. An example was provided that when a meter is 'Recently Dormant', its migration should be prioritised by sending Energy Suppliers a 15WD notice instead of waiting more than 15WD to send the notice, as this would accord with current industry CoS timelines and will allow for all CoS related activities to take place.	DCC has been tasked to reduce the period of dormancy resulting from a Change of Supplier event. DCC have reviewed the processes and are consulting on changes to these notification timescales. These changes are based upon a desire to further reduce migration timescales for recently dormant devices to minimise their loss of smart functionality and DCC is of the opinion that these are the shortest timescales possible that would provide minimal impact to Energy Supplier processes. The migration processes will only trigger after the Supply Start Date which is after the wider industry process has completed. Accordingly, there should be no discernible impact on Suppliers.
A respondent noted that there is not currently a robust proposal for the MCC to manage in-flight CoS between Energy Suppliers. The respondent was of the opinion that the proposed changes could impact in-flight CoS.	DCC notes the concerns but considers that there is a robust process which will deliver this requirement as these changes will only change the timeframes and not the process. Specific to dormant migrations, where there is a change of Responsible Supplier after the DCC has issued such notification, DCC may continue to carry out the relevant steps, as per TMAD clauses 4.29 and 4.30, and take "all reasonable steps" to notify the new Responsible Supplier prior to carrying them out.
A respondent raised a concern that for the losing Energy Supplier there would be insufficient time carry out necessary administrative aspects related to a CoS loss, and that the 7% of customers passing more quickly through migration process did not justify the impact to Energy Suppliers and end Customers. The respondent's view was that the benefit of a "no-fuss" CoS journey is the utmost priority. The CoS process is tied in with several Industry obligations and that there should not be any complications in this process.	Migration into DCC systems will occur after the Supply Start Date (SSD). Energy Suppliers should therefore have the information within their system to finalise the lost consumers' accounts in line with their current supply licence obligations. DCC's accelerated migration process will not be initiated until after the SSD. DCC agrees that the number of customers will be limited and that that additional work will be required to support these migrations. This is a small additional amount of work for DCC and as we will be initiating the process after SSD, we consider that this will only have a minimal impact on energy suppliers.
A respondent noted that as a Gaining Energy Supplier there was a change in the timing of industry flows for an updated DCC Service Flag. If the window is changing	The Migration Authorisation File is provided prior to the migration. If there is a CoS and device goes dormant just

from 7 days to 2 days, there is a high probability that DCC, and industry, would miss the chance to communicate this Flag to the Gaining Supplier by SSD. As a result, the Gaining Energy Supplier would not know whether this is an Enrolled site.	before migration then the process flow would not allow the migration to proceed. A Gaining Energy Supplier is alerted through the smart DCC platform when a dormant meter is migrated successfully. DCC will follow up the initial communication with all Energy Suppliers via a weekly file identifying any SMETS1 devices that they own which have not had the Security Certificates updated.
A respondent noted a losing Energy Supplier may not be able perform a mode switch, resulting in the Gaining Supplier operating a Smart prepayment without knowing and queried how would this be resolved.	This process will not be initiated until after SSD. In this instance, the losing Energy Supplier is obligated in terms of the Master Registration Agreement and the proposed Clause 4.49 of TMAD to have (and it is assumed will have) switched the payment mode to credit as they would for any other Change of Supplier. If they have failed to do so, we would expect the Energy Supplier to address this with the losing supplier and if the issue is persistent across multiple customers, we would expect this to be addressed via SECAS (SEC Operations Group and or SEC Panel).
A respondent raised a concern that if the migration and commissioning failed, or takes longer than 2 days, the CoS journey will progress as planned. The Gaining Energy Supplier would not be the Installing Supplier and would not have sent the MA.	Where there is a Change of Supplier event between the sending of the Migration Authorisation and the creation of the Migration Common File, this will automatically be recorded in an exception report. DCC will provide this content to the gaining Energy Supplier via the same file format that standard migrations are notified.
A Respondent referred to TMAD Clause 4.23, seeking confirmation that the Losing Energy Suppliers would be able to request that the Migration is stopped.	Clause 4.23 of the TMAD is not applicable to dormant devices and the proposed changes are only applicable to dormant devices.
A Respondent sought clarification as to when in the migration process the checks set out in 5.10.10 and 5.10.15 in Table 5.10 are carried out.	The checks are carried out 24 hours before migration date. The check is that the Change of Supplier event does not occur within 2 Working Days of the intended Migration Date. DCC will amend the text of 5.10.10 and 5.10.15 in Table 5.10 to reflect that these are Working Days.
A Respondent sought clarification regarding when there is Change of Supplier event identified within 2 Working Days of Migration date, querying whether the Migration Authorisation Validation received by the Supplier would be valid or whether the step 5.10.10 would be included in an MRR report.	Where there is a Change of Supplier event identified within 2 Working Days of Migration date, this will be captured in an exception report and DCC will halt migration. Error 5.10.10 occurs after the Migration Common File stage.
A respondent raised a concern that the reduced Service Level Agreement time periods should not be applied as there would be additional manual intervention required and that there was no clarity on what would happen if these were not met.	DCC is confident that it can manage the manual intervention required by Energy Suppliers for this in DCC systems. DCC has further discussed the manual intervention that would be required and is of the opinion that the additional effort would not be onerous.

A respondent had the view that the proposed changes would introduce a separate 'dormant through COS' process which would be inefficient. The respondent also considered that it would be misleading as it would imply that Energy Suppliers would be able to identify whether the dormant migration is a COS or BAU before the process starts.	Standard migrations and migrations which are expedited due to recent dormancy will pass through the same process, but to different timescales. DCC will produce separate migration files in the standard format for each and will identify which files should pass through the expedited process to our customers.
One of the respondents, who was generally supportive of the proposed changes, sought clarification of the timeline to respond to the requests as lead time may become challenging if reduced too much. The respondent suggested that increased transparency of the DCC's dormant firmware and migration plans would reduce the reliance on pre-notification significantly.	Energy Suppliers will only need to respond if they wish to remove a site from an Active migration. DCC will provide an 8 day window following CoS gain for Energy Suppliers to notify us if they wish to do this. DCC hold quarterly SMETS1 Migration Forums. DCC will present a detailed view of our operation of the dormant and active migration processes. The DMCT schedule is available on the DCC website here: https://www.smartdcc.co.uk/smart-future/enrolment-and-adoption/dmct-process/. DCC remains committed to working closely with our customers and welcome any opportunity to host them for a knowledge sharing session.
A respondent was supportive of the overall intent behind the DCC's proposals to reduce dormancy. However, they sought additional clarity on the proposed changes in Clause 4 of the TMAD to support the reduction in dormancy as they were of the opinion that the drafting does not provide sufficient detail around the exact mechanisms for notification prior to migration, specifically with regards to over-the-air Firmware upgrades. They raised a concern that the reduced timescales for notification are likely to place a burden on internal processes needed to prepare devices and they thought discussion on further options would be helpful.	DCC is of the opinion that the draft on this issue is sufficiently clear. DCC will provide additional support to Suppliers where requested.
A respondent noted support for reducing the possibility of additional SMETS1 meters becoming dormant and providing a negative consumer experience prior to migration to DCC. They noted that at time of consultation there are a limited number of Suppliers who are capable of operating meters that have been migrated to DCC as they are not DUIS 3.1 'ready' and it is likely there will still be a number of Suppliers unable to operate enrolled SMETS1 meters until late in 2020. Accordingly, Completion of Migration does not guarantee a consumer will have smart services maintained.	By migrating only sites where both fuels are dormant, DCC will not be reducing existing smart functionality but will be enabling smart functionality for the point where Energy Suppliers have adopted DUIS v3.x. Energy Suppliers have a licence obligation to be able to operate enrolled devices. Accordingly, the inability for Energy Suppliers to operate enrolled devices as they have not adopted DUIS v3.x should not be construed as an acceptable reason for a consumer to lose smart functionality.

A respondent sought clarification of the expectations on Energy Suppliers receiving notification of migration prior to notification of configuration as well as details of the sequencing of a fast-track Dormant Migration and the process for error handling and retry.	It is DCC's intention to provide notification to energy suppliers of configuration and migration at the same point using the existing notification process. Configuration will be notified as occurring in 5 Working Days' time. Migration will be notified as being attempted in 8 Working Days' time (assuming that configuration has been achieved). Where configuration is not achieved due to contracted timescales, DCC will follow the existing TMAD process of migrating as soon after the planned date unless notification has been received from the relevant Energy Suppliers that they would like to delay the migration.

Table 3

5. Areas of disagreement

Respondents raised an area of disagreement that there is potential manual intervention which could be increased as a result of the proposed changes. DCC has engaged with industry, and we consider that the level of additional manual intervention that will be required is not onerous and therefore manageable.

A number of respondents were of the view that the reduction in time would be inefficient and would have a negative impact. These concerns were focused around the timing of this process and a misunderstanding of when it would be initiated, with respondents expressing the view that it would start prior to the completion of the Change of Supplier Event. DCC would like to make it clear that the process will only take place once the Change of Supplier has taken place.

6. Summary of Changes to the TMAD

In light of the consultation responses received, DCC is proposing changes to TMAD as set out in the table below.

Drafting Reference	Description	Rationale for Change
Table 5.10 5.10.10	Unless the value of the CriticalSupplierCertificateID is the Null Certificate ID for the ESME, confirm, that, according to Registration Data, there is no change within the next ~~7~~ 2 Working D~~d~~ays to the Import Supplier in relation to the MPxN specified in the ESME element.	Changed day to Working Day to add clarity to the period reduction from 7 to 2 days.
Table 5.10 5.10.15	Unless the value of the CriticalSupplierCertificateID is the Null Certificate ID for the GSME, confirm, that, according to Registration Data, there is no change within the next ~~7~~ 2 Working D~~d~~ays to the Gas Supplier in relation to the MPxN specified in the GSME element.	Changed day to Working Day to add clarity to the period reduction from 7 to 2 days.

Table 4

7. Conclusions

DCC has prepared a version of TMAD containing changes related specifically to the early migration of recently dormant meters. DCC will provide a 'Second Conclusions' document related directly to FOC in due course.

DCC is confident that the revised drafting of versions of TMAD, that will be 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 versions of TMAD are defined to a sufficient level of detail for re-designation into the SEC;
- the revised versions of TMAD provide 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 versions of TMAD deliver 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 versions of TMAD are fit for purpose.

8. 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.

9. Attachments

- Attachment 1: Con Response TMAD_AL4.1_draft_clean
- Attachment 2: Con Response TMAD_AL4.1_draftmarkedup