



**SMETS1 regulatory changes to the Incident
Management Policy – Conclusions Document**

**DCC Conclusions and Report to Secretary of State on
changes to the Incident Management Policy (IMP) for
Telefonica UK Limited's role as a SMETS1 Communications
Service Provider.**

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1. Introduction and Context

The Incident Management Policy (IMP) provides process details regarding how DCC manages incidents and problems with SEC Parties. The IMP is included in the Smart Energy Code¹ (SEC) as Appendix AG and the latest version was included in the SEC on 28 July 2019 as Version 2.0.

On 18 May 2020, DCC issued a consultation on changes to the IMP related to SMETS1; covering services provided by Telefonica UK Limited as a SMETS1 Communications Service Provider (CSP) related to the MOC (MDS) cohort. These Telefonica UK Limited services are used to communicate with SMETS1 devices and it is important to note that such matters are entirely separate from the SMETS2 CSP services provided by Telefonica for SMETS2 devices installed in the Central Region and South Region.

This document considers responses to this consultation consistent with the regulatory requirements for revising the IMP.

2. Stakeholder Engagement

This section details DCC's stakeholder engagement that has taken place in relation to the revisions to the IMP.

On 18 May 2020, DCC published the consultation document titled '[SMETS1 Consultation on changes to the Incident Management Policy](#)' 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:

- [Incident Management Policy AG 3.0 draft](#);
- [Incident Management Policy AG 3.0 draft \(change marked against current SEC version\)](#); and
- draft text and proposed timescale for the Secretary of State's direction for the re-designation of the IMP.

Stakeholders were invited to respond by 16:00 on Friday 12 June 2020 using a response template that was provided as part of the consultation.

3. Consultation Questions & Respondents

The [SMETS1 changes to the Incident Management Policy - Response Template](#) presented the following consultation questions as set out in Table 1.

Number	Consultation Question
TEF IMP Q1	Do you have any views on the proposed changes to the IMP? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

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

Number	Consultation Question
TEF IMP Q2	Do you agree with the proposed re-designation date of Friday 3 July 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the IMP using draft notification at Attachment 1?

Table 1 – Consultation Questions

DCC received one written response to this consultation which was provided to the Secretary of State once the consultation had closed. Given the limited written response, DCC has subsequently contacted those stakeholders that typically respond to DCC consultations regarding SMETS1 to gauge their views.

4. Analysis of Responses

DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed every response. Where appropriate, DCC has engaged with respondents to discuss major areas of disagreement to understand if an agreement may be reached.

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.

4.1. Changes to the IMP (TEF IMP Q1)

DCC sought views on proposals to changes the IMP related to Telefonica UK's SMETS1 Devices asking "***Do you have any views on the proposed changes to the IMP? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.***".

4.1.1. Respondent View

The written respondent expressed disappointment that SMETS1 CSPs are not able to meet the incident time frames for SMETS2+. However, as set out in the consultation document, the SMETS1 CSPs service is consistent with the existing SMETS1 regime rather than the higher service standard for SMETS2+.

DCC's further engagement revealed that stakeholders were content with the proposals and thus had generally decided not to formally respond in a positive manner. No other concerns were raised during DCC's further stakeholder engagement.

4.1.2. Areas of Disagreement

There were no areas of disagreement on the changes to the IMP.

4.2. Secretary of State Regulatory Change (TEF IMP Q2)

DCC sought views on the planned date for the Secretary of State re-designating the IMP asking ***“Do you agree with the proposed re-designation date of Friday 3 July 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the IMP using draft notification at Attachment 1?”***.

4.2.1. Respondent View

The written respondent supported the proposed date for the Secretary of State to re-designate the IMP.

No other concerns were raised during DCC’s further stakeholder engagement.

4.2.2. Areas of Disagreement

There were no areas of disagreement with the date for re-designation.

5. Summary of Drafting Changes

The consultation process gave rise to no changes to the IMP.

6. Conclusions

DCC is confident that the version of the IMP, 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 IMP.

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

DCC considers that:

- the revised IMP is defined to a sufficient level of detail for re-designation into the SEC;
- the revised IMP 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 IMP is materially complete, and the content is technically accurate.

In summary, DCC considers that the revised IMP is fit for purpose.

7. Next Steps

DCC submitted this conclusions report to the Secretary of State on the date of publication.

Following the submission of IMP to the Secretary of State, DCC expects the Secretary of State to make a decision on whether and when to re-designate¹ the revised IMP into the regulatory framework utilising the draft direction text as presented in Attachment 1 of this conclusions report.

8. Attachments

- Attachment 1 – Incident Management Policy Draft Notification Text
- Attachment 2 – Incident Management Policy V3.0 draft (clean)
- Attachment 3 - Incident Management Policy V3.0 draft (change marked against V2.0)

¹ NB Based on this consultation process, the earliest date that the IMP could be re-designated is 3 July 2020.

Attachment 1

This attachment contains the text that BEIS plans to use for direction of changes to the IMP.

Incident Management Policy 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 Incident Management Policy previously designated and incorporated into the SEC as Appendix AG 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 Incident Management Policy shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or to the continuing effectiveness of anything done 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.