

SMETS1 Transition and Migration Approach Document (TMAD) for Secure (TMAD v5.1 draft)

DCC Conclusions and Report to Secretary of State

Date: 30 June 2020

Classification: DCC Public



1 Contents

- 1 Introduction and Context.....3**
- 2 Regulatory Requirements.....3**
- 3 Consultation3**
 - 3.1 Consultation Questions3
 - 3.2 Respondents4
- 4 Analysis of Responses4**
 - 4.1 General Comments (Q1)5
 - 4.2 Minimising Dormancy (Q2)6
 - 4.3 Detailed Comments on drafting (Q3)7
- 5 Summary of Changes to the TMAD13**
- 6 Areas of Disagreement15**
- 7 Conclusions.....16**
- 8 Next Steps.....16**
- 9 Attachments16**

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 have been a number of changes to the TMAD to cover requirements for the Middle Operating Capability (MOC - MDS) for SMETS1 Services and some limited changes following the delivery of the Initial Operating Capability. DCC has also consulted on changes that are required for the Middle Operating Capability (Secure) and Final Operating Capability (FOC). The FOC release covers the Trilliant and Landis+Gyr device set, currently operated by three SMSOs. On 15 June 2020, BEIS designated version 5.0 of TMAD which included changes that were necessary for the SMETS1 Device Security Testing.

This document provides DCC's conclusion to the TMAD changes required to support the migration of Secure meters to the DCC. This version of TMAD has also been made against the current designated version that was designated by BEIS on 15 June 2020.

2 Regulatory Requirements

The TMAD is produced pursuant to Section N6.4 of the SEC and BEIS has the power to re-designate it under Section X5 of the SEC.

3 Consultation

On 13 March 2020, DCC published the consultation for the Secure TMAD¹ on the DCC Website. DCC's Service Desk also emailed stakeholders to notify them of the publication.

Stakeholders were invited to respond by 16:00 on Friday 3 April 2020 in a template format that was attached to the consultation.

3.1 Consultation Questions

The consultation presented 9 questions as presented in Table 1.

Table 1 – Secure TMAD Consultation Questions

Q Num	Question
TMAD Secure Q1	Do you have any general comments on the changes to the TMAD for MOC (Secure)?

¹ <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-consultation-on-tmad-for-secure/>

Q Num	Question
TMAD Secure Q2	Do you have any comments on the UTRN cutover arrangements including the appropriateness of the proposed UTRN period (48 hours) for processing the UTRN requests via the SMSO after the device has been commissioned?
TMAD Secure Q3	Do you have any comments on the timescales for Separation of the Secure SMETS1 SMSO System from the S1SP System?
TMAD SecureQ4	Do you have any comments on SUA and the implications for Rollback?
TMAD SecureQ5	Do you have any comments on the process for the configuration of active devices for MOC (Secure)? Do you have any comments on your ability to apply configurations to the active devices in time to support migration from June 2020?
TMAD SecureQ6	Do you have any comments on the process for the configuration of dormant devices for MOC (Secure)?
TMAD SecureQ7	Do you have any comments on the exclusions from the migration process?
TMAD SecureQ8	Do you have any detailed comments on the changes to the legal drafting in TMAD? Please provide a rationale for your views.
TMAD SecureQ9	Do you agree with the proposed re-designation date of 26 June 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the TMAD using the draft direction at Annex A?

3.2 Respondents

DCC received 8 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, which is 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.

DCC received a response from Secure to this consultation. Due to the commercial nature of the response, DCC has approached Secure directly in order to address the comments that were raised. DCC has accordingly not included the Secure response in this consultation response but have taken them into consideration in concluding on this consultation.

4.1 General Comments (Q1)

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

Comment	DCC Response
<p>Respondents raised concerns that once there was a Separation between the Secure SMSO and DCC Systems as provided for in Clause 3.14E, there might be some devices that are never enrolled on the DCC System and that there might be scope for an enduring Secure SMSO system for SMETS1 devices that are not enrolled into the DCC Systems.</p>	<p>Condition 48 of the Standard Conditions of Gas Supply Licence and Condition 54 of the Standard Conditions of Electricity Supply Licence obligate Energy Suppliers to enrol their devices on the DCC System or replace any devices that are not so enrolled with a SMETS2+ device².</p> <p>Section G2.20 (Security) of the SEC places an obligation on DCC to ensure that all DCC Systems which form part of the DCC Total System are Separated from any other Systems. For this reason, the SMSO system must be Separated from the S1SP system.</p>
<p>A respondent sought clarification on the communication method for the proposed TMAD change to 4.23 for stopping the commencement of migrations.</p>	<p>A migration can be stopped in terms of Section 4.23 of TMAD by contacting the MCC directly by email at migration@smartdcc.co.uk. DCC would like to note that should the Supplier notify DCC prior to 4.30pm the day before the date that the migration is due to proceed, this will allow DCC sufficient time to ensure that the SMSO is instructed not to proceed with the migrations.</p>
<p>Concerns were raised about the impact of Covid-19 and the potential impact that the pandemic could have on the migration process and customers.</p>	<p>DCC notes the concerns raised and would like to reassure parties and customers that DCC will adjust dormant migrations appropriately where there is a potential to negatively impact consumers, and notes that a Supplier is in control of its migration process for customers with active meters.</p>
<p>A respondent sought information on how a stopped migration would be reflected in the MRR report.</p>	<p>Once a migration has been commenced, DCC will not stop the migration. The manner in which the cancellation is reported will depend on the point at which it has been cancelled.</p>

² Please see the rationale set out here: <https://www.gov.uk/government/consultations/maximising-interoperability-for-first-generation-smets1-smart-meters>.

	<p>If the migration is cancelled prior to the Migration Common File (MCF) being submitted, it will not be recorded as a migration in the Migration Reporting Regime (MRR) report S1MIG-006. As the migration was included in the Migration Authorisation it will be reported as cancelled in report S1MIG-010. For MRR reports S1MIG-001 to S1MIG-005, a migration that has been cancelled prior to the submission of the MCF will not be reported as a Migration.</p>
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

4.2 UTRN Cutover Arrangements (Q2)

TMAD Q2: Do you have any comments on the UTRN cutover arrangements including the appropriateness of the proposed UTRN period (48 hours) for processing the UTRN requests via the SMSO after the device has been commissioned?

Comment	DCC Response
<p>Respondents provided detailed responses to this question, requesting that the length of the 48 hour UTRN cutover period be increased. Respondents provided extensive reasons as to why they considered it necessary to increase this period which included the steps required to recover from the loss of the N55 alert issue so that the Customer is able to vend without issue following the UTRN cutover and to resolve and SMI update issues. Respondents also were concerned that 48 hours would be insufficient time to ensure meters could communicate with DCC and to resolve any issues that arose. Requests for an increase in the time frame ranged from four working days to nine months.</p>	<p>DCC has carefully considered the submissions contained in the responses and the feasibility of increasing this period as well as security considerations. Based on the views expressed by Suppliers, DCC has amended the drafting to increase this period from 48 hours to 336 hours which is the equivalent of 14 days. DCC is of the opinion that this period will meet the requirements of Suppliers to ensure that they are able to align their systems to that of DCC to allow for a continuous ability to top up prepayment meters and thereby no impact on consumers.</p> <p>DCC is of the opinion that the increase in this period will not provide additional complexity to the process. DCC is of the view that any period that is longer than the 336 hour period will disproportionately increase the security risk to DCC Systems. and is therefore not be acceptable. DCC has discussed this approach with the Security Sub-Committee who do not object to it.</p> <p>The ability to carry out web-based vending from the Secure SMSO will end when the meter is switched to the DCC account which occurs at the point the point migration starts.</p>

	It will still be possible for the PSP to carry out top ups using the existing process during the UTRN Period, depending on the Suppliers' commercial arrangements with the Secure SMSO.
A respondent sought to understand the situation where there was a stranded device due to a failure to roll back and there were no commercial arrangements in place with Secure	Commercial arrangements are needed with Secure to cater for the period from when migration starts until the only possible route to process top ups is via the DUIS interface. If a migration is not completed and the device is rendered stranded, any arrangements with Secure to process UTRNs should not be affected by this.

4.3 Separation of SMSO and S1SP (Q3)

Do you have any comments on the timescales for Separation of the Secure SMETS1 SMSO System from the S1SP System?

Comment	DCC Response
A Respondents sought confirmation of an apparent conflict between TMAD clause 3.14E and clauses 7.1 to 7.4 where different governance processes apply to the Separation of the DCC solution from the Secure SMSO system as compared to the RP decommissioning Timetable.	Clause 3.14E relates specifically to the requirements set out in Section G19 to G22 of the SEC (Security). The obligations placed on DCC in this regard are that there should be a Separation of systems. Clauses 7.1 to 7.4 relate to the role of the Requesting Party, which does not equate to an existing regulatory requirement in the SEC. DCC does not consider that these different governance processes give rise to any conflict.
Respondents sought to understand the impact of the Separation set out in clause 3.14E.	<p>The Separation is due to occur 15 months after the last Secure EPCL entry has been entered onto the EPCL (measured as 3 months after a standstill period of EPCL entries for Secure meters of 12 months). At this point, the migration of SMETS1 compliant devices should have been completed.</p> <p>The licence obligation on Supplier is to (take all reasonable steps to) complete all migrations within 12 months of a DMC being approved onto the EPCL or in terms of the date specified in Condition 48 of the Standard Conditions of Gas Supply Licence</p>

	<p>and Condition 54 of the Standard Conditions of Electricity Supply Licence. It is anticipated that the 15 month period would extend beyond either of these dates.</p> <p>However, if it becomes apparent that the complete migration of devices is not possible within that 15 month period and there is a good case for its extension, a consultation on a change to the date could be carried out and a new version of TMAD designated with the new period replacing the current timing in clause 3.14E.</p>
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

4.4 Detailed Comments on drafting (Q4)

Do you have any comments on Single Use Authorisation (SUA) and the implications for Rollback?

The Rollback conditions have not changed on the basis of comments that have been received. DCC notes that the agreements between Secure SMSO and their customers as to how these devices will be returned to the Supplier Account for a resubmission into the migration process have not yet concluded.

Secure SMSO have stated Suppliers can make independent arrangements with Secure for devices rolled back by DCC to Secure (subject to technical feasibility). This is only relevant to Active Devices, Dormant Devices will be within the scope of DCC to retry.

Comment	DCC Response
Respondents sought to understand where the cost would lie for devices that are unable to be rolled back and would require an urgent site visit to replace.	DCC is of the opinion that it would be a rare occurrence for this to happen due to the checks set out in TMAD including the check of the communication 7 days prior to migration. DCC would not be responsible for the costs of replacement where it had conducted migrations in line with the TMAD requirement of Good Industry Practice
Is the Single Use Authorisation (SUA) key technical schema new and will this will be published	DCC confirms that there is no technical schema for the SUA key. The only XML schemas that exist are the migration schemas used by DCC during migration, and the DUIS and MMC schema's for operations post-migration.
Respondents raised concerns about the risk of having to physically replace devices and	DCC notes the response. DCC is carrying out robust testing in line with the SVTAD, MTAD and Depth and Breadth documents.

that they expected DCC to have tested its migration process to mitigate this risk.	DCC is confident that the number of devices that will require a rollback is minimal and that where it is required, this will work in the vast majority of cases. DCC has the option to suspend the migration of dormant devices where there is a significant issue that is uncovered that impact the migrations of devices and Suppliers can request that where they have submitted a Migration Authorisation and migration has not commenced, that these devices are not migrated.
A respondent commented that they were awaiting the details on the configuration of Secure Devices.	DCC notes this. On 5 June DCC concluded on the SMETS1 Supporting Requirements changes that are required for Secure and is currently consulting on further proposed changes that have been identified. ³

4.5 Configuration (Q5)

Do you have any comments on the process for the configuration of active devices for MOC (Secure)?

Do you have any comments on your ability to apply configurations to the active devices in time to support migration from June 2020?

In addition to the response below, DCC will continue to engage with Suppliers to track their progress in applying the configuration and their ability to migrate installations against the projections that have been submitted.

Comment	DCC Response
Respondents noted that they were confident that they would be able to meet the June 2020 date. However, they did note that there was still technical work that had to be completed and issues resolved.	DCC notes this response and wish to point out that the go-live date is now 26 July 2020.
A respondent sought to understand whether the migration schema changes for Secure would have implications on supplier	There will be no impact as the schema is the same across both cohorts, however the name of the Schema has changed but the content remains unchanged.

³ <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/dcc-response-to-the-smets1-supporting-requirement-consultation/>

<https://www.smartdcc.co.uk/customer-hub/consultations/further-consultation-on-changes-to-the-smets1-supporting-requirements-for-secure/>

solutions for FOC as the same schema will be used across both cohorts.	
Respondents raised concerns about the impact of the Covid-19 pandemic on their ability to adequately test their migration process and that this could have an impact on their ability to migrate devices.	DCC notes these concerns and would like to note that MDUST will be available from 29 June 2020 and on 18 August 2020 for UIT-A for Secure.
A respondent raised concerns about the period when they would receive details of the proposed configuration. They indicated that it would not be possible to have all devices ready to be migrated at the date that Secure meters are added to the EPCL and that it would take time to align all the devices that they intend to migrate with the correct firmware and configuration.	DCC notes these concerns and does not expect all devices to be ready to be migrated at go-live. Devices only need to be configured prior to migration and not at the point of placing the DMC on the EPCL. It is for Suppliers to provide details of when they wish to migrate devices, with their constraints being the licence conditions that they must adhere to relating to the enrolment of devices. On 5 June DCC concluded on the SMETS1 Supporting Requirements changes that are required for Secure and is currently consulting on further proposed changes that have been identified.
A respondent noted that it was carrying out technical work and would defer to Secure on any technical capabilities	DCC noted the comment.

4.6 Configuration Process (Q6)

Do you have any comments on the process for the configuration of dormant devices for MOC (Secure)?

DCC received no substantive comments to question 6, with support for the proposed approach being provided.

4.7 Exclusions from Migration Process (Q7)

Do you have any comments on the exclusions from the migration process?

Comment	DCC Response
Respondents sought clarification on the third party devices, specifically what non-Secure manufactured devices could be migrated and the steps that would be required to migrate these devices.	No third party devices (i.e. those not manufactured by Secure) will be migrated as Secure do not maintain details for any type of third party (non-Secure manufactured) devices that are joined to the HAN aside from the device GUID. However,

	<p>the devices will continue to work even though it is not in the inventory and they will continue to operate on the HAN so the supplier could add these to the inventory post-migration using the usual process of service requests. A combination of:</p> <ul style="list-style-type: none"> ▪ Device Pre-notification; ▪ Update HAN Device Log; ▪ Request Handover Of DCC Controlled Device; ▪ Join Service (Critical); ▪ Join Service (Non-Critical); and ▪ Commission Device.
<p>Respondents sought further details impact of the migration on HAN repeaters.</p>	<p>As set out above, third party devices will be excluded from migration. However, the devices will continue to work even though it is not in the inventory. Therefore, the functionality of the devices will not be impacted by migration.</p>

4.8 Legal Drafting (Q8)

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

Comment	DCC Response
<p>Respondents raised concerns about the drafting relating to the 48 hour UTRN period.</p>	<p>DCC has amended the drafting of TMAD to reflect the views to the consultation and changed the period from 48 hours to 336 hours. DCC is of the opinion that this addresses many of the points that were raised relating to the UTRN period drafting.</p>
<p>A respondent raised a concern over the drafting of clause 3.7 including indicating that it did not think the change was required. A second respondent sought further clarification than what was contained in the consultation.</p>	<p>The Secretary of State provides the final approval of entering DMCs onto the EPCL that become eligible for migration. The intention was always that the Secretary of State would do this for the duration of the migration process. PPCT is an enduring process to apply to migrated devices, that will continue after the migration of all devices has taken place. The Secretary of</p>

	<p>State never intended to have control over upgrades to enrolled devices that would result in new EPCL entries. This change is proposed to ensure that parties are aware that the Secretary of State will not be providing the final authorisation for DMCs onto the EPCL for DMCs that have gone through the PPCT process.</p>
<p>A respondent sought that clause 4.23 should be amended to clarify the following:</p> <ul style="list-style-type: none"> ▪ Partially processed migrations will continue to be processed; and ▪ The Migration Authorisation (MA) of the following week will be processed without the Supplier requesting recommencement. 	<p>In the case of the Secure cohort, DCC can confirm that where a Supplier has so requested in respect of its Active Meter(s) in an Installation, DCC will take all reasonable steps to not start the migration of the requested Installation. The effect of this will be that any other Installations within the same Migration Authorisation/within all Migration Authorisations for that day that are due for Migration on the same day as the Installation(s) that are the subject of the cancellation request and for which migration has not yet commenced will also not be started.</p> <p>Once a migration has been commenced, DCC will not stop the migration and partially processed migrations will therefore continue to be processed. It is DCC's view that the legal text does not need to be amended as DCC is obliged to follow the process and complete partially processed migrations.</p> <p>DCC will attempt any Installations authorised for Migration in the subsequent week without the Supplier having to request a recommencement. DCC's view is that it is not necessary to amend the legal text in this regard as TMAD would require the processing of the MA for the following week irrespective of the content of clause 4.23. DCC will also attempt any migrations that have been submitted for subsequent days of the week.</p> <p>DCC has however amended the drafting to provide further clarification and to differentiate between the process for Secure and the other cohorts.</p>

A respondent considered that the Migration Error Guide should be updated as a result of the changes that are being proposed.	DCC is in the process of updating the Migration and Error Handling Retry, which DCC intends to consult and conclude on by the end of June.
A respondent queried whether the changes that were proposed to TMAD for clause 4.49 during the FOC TMAD consultation should also be applicable to the Secure TMAD.	Clause 4.49 is part of the migration process but is not applicable to Secure as there are no prepayment keys for Secure.

4.9 Designation (Q9)

Do you agree with the proposed re-designation date of 26 June 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the TMAD using the draft direction at Annex A?

DCC notes that the go-live date for Secure has been pushed pack to 26 July. DCC anticipates that BEIS will designate this version of TMAD on 26 July, which is within the one month period set out in the consultation.

Comment	DCC Response
Respondents were broadly supportive of the proposed dates. One of the respondents noted that the date is 2 days prior to the proposed go-live date.	The trigger for the use of the migration solution is the approval of the DMCs to be added to the EPCL and not the designation of TMAD, hence go-live occurs when the first EPCL entry is approved. DCC has discussed with BEIS and confirms that it is currently BEIS' intention that both the designation of TMAD and the EPCL approval will occur on the same date. The current planned date for this is 26 July 2020.

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**.

There have been minor typographical changes including a change to the definitions to ensure that these are in alphabetical order as a result of an external legal review.

Figure 2 – Changes to the TMAD

Drafting Change	Description and Rationale for change
<p>Definition:</p> <p>Relevant Device: Relevant Device means an Active Meter in a SMETS1 Installation Device-with which, prior to the UTRN Period, Secure SMSO communicated on behalf of the Responsible Supplier.</p>	<p>Amended definition to provide clarity</p>
<p>Definition:</p> <p>Single Use Authorisation Code (SUA): A one-time authorisation code used by Devices with GroupID = “DA” when cryptographically verifying commandsInstruction.</p>	
<p>Definition:</p> <p>UTRN Period In relation to an ESME or a GSME that forms part of a SMETS1 Installation that is within the Group with a GroupID = “DA”, a period that:</p> <p>(a) commences from the time at which the step in Clause 3.14C(a) has been successfully passed in relation to that Device; and</p> <p>(b) has a duration that is 48336 hours.</p>	<p>Text amended as a result of comments received from Industry.</p>
<p>4.23 TheWith the exception of GroupID = DA, the DCC shall, where requested to do so by a Responsible Supplier for one or more SMETS1 Installations comprising an Active Meter for which that Supplier is the Responsible Supplier, take all reasonable steps not to start the Migration of those SMETS1 Installations notwithstanding that the DCC has previously received a Migration Authorisation in respect of them from the Responsible Supplier.</p> <p>4.23A For GroupID = DA where requested by a Responsible Supplier, the DCC shall take all reasonable steps to avoid the commencement of the Migration of any SMETS1 Installation for which that Supplier Party is a Responsible Supplier for one (or both) Active Meters. The effect of this shall be that the DCC shall not commence the Migration of any of the SMETS1 Installations contained in any Migration Authorisation received</p>	<p>For clause 4.23, DCC has amended the drafting to provide further clarification. The provisions for IOC remain unchanged, with the proposed change being Secure specific. DCC has amended the text of TMAD to reflect that the request to not start migrations will result in the remainder of the migrations that have not been started for the particular day will not start.</p>

Drafting Change	Description and Rationale for change
<p>from that Responsible Supplier for that particular day for which Migration has not yet commenced.</p>	
<p>Where the Commissioning Party receives a Migration Common File or an S1SP Commissioning File, then the Commissioning Party shall, as the Authenticator, undertake the sequence of checks and processing excluding Step number 5.9.10 required by Table 5.9 for such a file.</p>	<p>Removed as Step 5.9.10 has been removed and is superfluous.</p>
<p>4.34A Where there is more than one SMETS1 PPMID, SMETS1 IHD or SMETS1 CAD in a SMETS1 Installation, that is comprised solely of Dormant meters, the DCC shall include only one of each Device Type in the Migration Common File, being the one that most recently joined the HAN which shall be the one that was most recently joined to the HAN. Any SMETS1 PPMID, SMETS1 IHD or SMETS1 CAD for which there is insufficient information in order to populate the Migration Common File shall not be included in the MCF and therefore shall not be Migrated.</p>	<p>Clause 4.34A has been amended to clarify the position relating to the migration of SMETS1 PPMID, SMETS1 IHD or SMETS1 CAD in a SMETS1 Installation</p>
<p>4.44A Where there is more than one SMETS1 PPMID, SMETS1 IHD or SMETS1 CAD in a SMETS1 Installation, that is comprised of Active or Mixed Installations, the DCC shall include only one of each Device Type in the Migration Common File, which shall will be the one that was most recently joined to the HAN. Any SMETS1 PPMID, SMETS1 IHD or SMETS1 CAD for which there is insufficient information in order to populate the Migration Common File shall not be included in the MCF and therefore shall not be Migrated.</p>	<p>Clause 4.44A has been added to make it clear that only one SMETS1 PPMID, SMETS1 IHD or SMETS1 CAD in a SMETS1 Installation will be migrated for Active and Mixed devices</p>
<p>5.27(c)(iii) undertake no further processing in relation to that SMETS1 Installation as part of the processing of the that 'DCO Required File Set' or 'S1SP Required File Set', and discard information it has stored or derived about that SMETS1 Installation;</p>	<p>5.27 has been amended to reflect the differentiation between S1SP and DCO set out in Clauses 16.4 and 16.5.</p>

6 Areas of Disagreement

DCC is of the opinion that comments related to the Secure TMAD specific changes contain an area of disagreement over the proposed 48 hour cutover period which DCC has extended to 336 hours.

Respondents raised concerns over the rollback of devices into the Secure SMSO system as the inability to rollback devices would necessitate a replacement of the device. It has been

determined that a complete rollback of devices into the Secure SMSO System will be a Security risk and DCC is accordingly not going to change its process to allow a complete rollback functionality. A rollback of the devices will be possible, however the device may not have full functionality where the GSME SUA key rotation attempt has resulted in the device being in an unknown state.

There were no other areas of disagreement.

7 Conclusions

DCC is confident that the revised drafting of the 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 version of TMAD is defined to a sufficient level of detail for re-designation into the SEC;
- the revised version of 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 version of TMAD delivers the regulatory requirements specified in Section N6.4 the SEC, are materially complete, the content is technically accurate, and is aligned with the DCC design.

In summary, DCC considers that the revised version of TMAD is fit for purpose.

8 Next Steps

Following the submission of TMAD to the Secretary of State, DCC anticipates that Secretary of State will make a decision on whether and when to re-designate the revised Secure TMAD into the regulatory framework. The go-live date for Secure has changed to 26 July which will allow BEIS to designate this version of TMAD within the timeframe that was set out in the consultation.

9 Attachments

- Attachment 1: TMAD Draft Re-designation Text
- Attachment 1: APPENDIX AL - Transition_and_Migration_Approach_Document V5.1
Marked against consultation version
- Attachment 2: APPENDIX AL - Transition_and_Migration_Approach_Document V5.1
Marked against V5.0
- Attachment 3: APPENDIX AL - Transition_and_Migration_Approach_Document V5.1
clean

Annex A

This annex contains the draft direction and re-designation text that BEIS intend to utilise for re-designation of the TMAD.

Draft Re-designation 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 [26 June 2020], the SMETS1 Transition and Migration Approach Document 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 to the continuing effectiveness of anything done under 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.