



SMETS1 Conclusions on Early Firmware Updates

DCC Conclusions and Report to Secretary of State on
changes to the SMETS1 Transition and Migration
Approach Document (TMAD).

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Table of Contents

1. Introduction and Context	3
2. Stakeholder Engagement.....	3
3. Consultation Questions & Respondents.....	3
4. Analysis of Responses.....	4
4.1. Changes to the TMAD (Firmware Q1)	4
4.1.1. Respondent View.....	4
4.1.2. Areas of Disagreement	5
4.2. Secretary of State Regulatory Change (Firmware Q2)	5
4.2.1. Respondent View.....	5
4.2.2. Areas of Disagreement	6
5. Summary of Drafting Changes	6
6. Conclusions.....	6
7. Next Steps	6
8. Attachments	7

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 TMAD is Appendix AL of the Smart Energy Code¹ (SEC) and the latest version (AL 6.0) was included in the SEC on 24 July 2020.

On 24 July 2020, DCC issued a consultation on changes to the TMAD to allow DCC to instruct firmware updates on dormant Devices earlier than the existing arrangement. This change is intended to expedite the migration of SMETS1 Installations containing Dormant Devices and thus increase the overall benefits of enrolment of SMETS1 Devices with the DCC.

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

2. Stakeholder Engagement

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

On 21 August 2020, DCC published the consultation document titled '[SMETS1 Consultation on Early Firmware Updates](#)' 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 5.2 draft \(change marked against V5.1\)](#); and
- draft text and proposed timescale for the Secretary of State's direction for the re-designation of the TMAD.

DCC also held a consultation briefing session for stakeholders on Tuesday 11 August 2020.

Stakeholders were invited to respond by 16:00 on Friday 21 August 2020 using a response template that was provided as part of the consultation.

3. Consultation Questions & Respondents

The [SMETS1 Consultation – TMAD changes for the early firmware update - Response Template](#) presented the following consultation questions as set out in Table 1.

Number	Consultation Question
Firmware Q1	Do you agree with the proposal for firmware updates post completion of MT/SIT or issuing of a DMCT EPCL Report and prior to an entry being made on the EPCL? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

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

Number	Consultation Question
Firmware Q2	Do you agree with the proposed re-designation date for early firmware updates of Friday 4 September 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) using draft notification at Attachment 1?

Table 1 – Consultation Questions

DCC received four written responses to this consultation which were provided to the Secretary of State once the consultation had closed.

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 TMAD (Firmware Q1)

DCC sought views on proposed changes to the TMAD for early firmware updates in respect of Dormant Meters and associated Devices asking **“Do you agree with the proposal for firmware updates post completion of MT/SIT or issuing of a DMCT EPCL Report and prior to an entry being made on the EPCL? 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

Three respondents supported the proposal to amend the TMAD to support early firmware updates.

One respondent was supportive of the change but expressed a general concern regarding the priority assigned to the migration of SMETS1 Installations containing Dormant Devices in the TMAD, compared to SMETS1 Installations containing Active Devices given the respective Migration related licence obligations on DCC and Energy Suppliers. DCC observes that the Migration contention between Active and Dormant already exists noting that Clause 4.24 of the TMAD already prescribes that DCC should give priority to the Migration of SMETS1 Installations containing Dormant Devices in order to prioritise the restoration of smart services for such customers. DCC notes the Migration Scaling Methodology² (MSM) prescribes how Migration capacity is allocated where capacity constraints arise and the MSM is explicit on the priority

² The latest MSM is available via <https://www.smartdcc.co.uk/document-centre/tmad-child-documents/migration-scaling-methodology>.

assigned to the Migration of SMETS1 Installations containing Dormant Devices consistent with the requirements set out in Clause 4.24 of the TMAD.

One respondent objected to the change where the planned entry on the EPCL is expected to be added based on substantive equivalence rather than testing, under the DMCT Process. DCC has discussed this matter further with the respondent to confirm that the respondent didn't have an objection to the principle of early firmware updates for Dormant Devices. Instead, the respondent's concerns related to any reliance on substantive equivalence within the DMCT Process for recommending an EPCL entry. DCC notes that the proposal is for early firmware updates before final stakeholder governance is completed for EPCL entries. Within the DMCT Process, any objection related to reliance on substantive equivalence will be raised / addressed before the DMCT EPCL Report (upon which the early firmware update is reliant on) is finalised. DCC notes that the matters related to substantive equivalence are subject to a separate consultation³ which proposes improvements to the DMCT Process.

One respondent that was supportive of the change expressed concern that the proposal did not maximise the benefit that could be provided from an early firmware update. This respondent proposed that the decision point for an early firmware update should be solely a decision between DCC and the respective SMETS1 SMSO (based on their collective assessment of confidence in the firmware) as the risks are low. However, the approach proposed by DCC was based on completion of testing of the actual DMC being proposed for entry, or of the DMC on which substantive equivalence is being placed for a proposed entry, so that confidence in the firmware is demonstrated to all stakeholders (especially Energy Supplier of SMETS1 Installations containing Dormant Devices) prior to upgrades taking place.

There were no concerns raised at the stakeholder briefing.

4.1.2. Areas of Disagreement

There were no unresolved areas of disagreement.

4.2. Secretary of State Regulatory Change (Firmware Q2)

DCC sought views on the planned date for the Secretary of State re-designating the TMAD asking ***"Do you agree with the proposed re-designation date for early firmware updates of Friday 4 September 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) using draft notification at Attachment 1?"***.

4.2.1. Respondent View

Three respondents supported the proposed date for the Secretary of State to re-designate the TMAD.

The respondent that objected to the proposal (Q1) also objected to the proposed date for re-designation. DCC resolved these concerns via a further discussion as set out above in Section 4.1.1.

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

³ <https://www.smartdcc.co.uk/customer-hub/consultations/dmct-process-improvement>.

4.2.2. Areas of Disagreement

There were no unresolved areas of disagreement.

5. Summary of Drafting Changes

The consultation process gave rise to no material drafting changes to the TMAD. There was one typographical change to Clause 4.26 of the TMAD which is highlighted in **yellow**.

The version of the TMAD used as the basis for this consultation was the conclusion version for MOC (Secure)⁴. On the day the consultation document was issued, the Secretary of State re-designated the TMAD as V6.0 and thus the TMAD changes to this conclusions document are transcribed against V6.0 of the TMAD and presented as V7.0 draft.

6. Conclusions

DCC is confident that the version of the TMAD, 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.

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

DCC considers that:

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

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

7. Next Steps

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

⁴ See www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/dcc-conclusion-on-the-consultation-on-tmada-for-secure.

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 utilising the draft direction text as presented in Attachment 1 of the consultation document⁵. Given the date of publication, DCC expects that the earliest the Secretary of State will re-designate the TMAD will be Friday 11 September 2020.

8. Attachments

- Attachment 1 - TMAD V7.0 draft (change marked against V6.0)

⁵ https://www.smartdcc.co.uk/media/4077/early_firmware_consultation_issued.pdf