

SMETS1 Conclusions on S1SR for Aclara and MOC (Secure)

DCC Conclusions and Report to Secretary of State on
changes to the SMETS 1 Supporting Requirements (S1SR)
to support MOC (Secure) and Aclara.

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Author: consultations@smartdcc.co.uk

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1. Introduction and Context

The SMETS 1 Supporting Requirements (S1SR) describes supplementary rules for how the DCC will process SMETS1 Service Requests / Service Reference Variants (SRs / SRVs) and includes the accommodation of behaviours that are specific to particular SMETS1 Device Models. This document is included in the Smart Energy Code¹ (SEC) as Appendix AM and the latest version (5.0) was included in the SEC on 24 November 2020.

DCC issued a consultation² on 9 November 2020 covering changes to the S1SR for MOC (Secure) and Aclara which closed on 20 November 2020. This document considers responses to this consultation consistent with the regulatory requirements for revising the S1SR.

2. Stakeholder Engagement

This section details DCC's stakeholder engagement that has taken place in relation to the proposed revisions to the S1SR.

On 9 November 2020, DCC published the consultation document titled '[SMETS1 Consultation on additional changes to the S1SR for Aclara and MOC \(Secure\)](#)' 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 Supporting Requirement AM 5.2 \(change marked against AM5.1\)](#);
- [SMETS1 Supporting Requirement AM 5.2 Annex A DMVES](#); and
- draft text and proposed timescale for the Secretary of State's direction for the re-designation of the S1SR.

Stakeholders were invited to respond to the consultation by 16:00 on Friday 20 November 2020 using the response template that was provided.

3. Consultation Questions & Responses

The consultation template titled '[SMETS1 Consultation on additional changes to the S1SR for Aclara and MOC \(Secure\)– Response Template](#)' presented the following consultation questions as set out in Table 1.

Number	Question
NOV2020 S1SR Q1	Do you agree with the proposed amendments to the S1SR in Clause 18 of that document, that have been added to describe the device behaviours specific for the Aclara devices? 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/>.

² <https://www.smartdcc.co.uk/customer-hub/consultations/smets1-consultation-on-additional-changes-to-the-s1sr-for-aclara-and-moc-secure/>

Number	Question
NOV2020 S1SR Q2	Do you agree with the proposed amendments to the S1SR in Clause 18 of that document, that have been added to describe the device behaviours specific to the MOC Secure devices? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
NOV2020 S1SR Q3	Do you agree with mappings of clauses in Clause 18 of S1SR to the relevant Device Models in DMVES for MOC (Secure)? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
NOV2020 S1SR Q4	Do you agree with the proposed re-designation date of 4 December 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the S1SR using draft notification at Attachment 1?

Table 1 – Consultation Questions

3.1. Responses

DCC received a written response from four respondents to the consultation on the S1SR.

DCC provided all written responses to the Secretary of State once the consultations 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. S1SR Changes for Aclara (NOV2020 S1SR Q1)

DCC sought views on proposals to amend the S1SR for device behaviours related to Aclara asking ***“Do you agree with the proposed amendments to the S1SR in Clause 18 of that document, that have been added to describe the device behaviours specific for the Aclara devices? 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 respondent provided a response to this question.

These respondents expressed support for the proposal without further comment.

4.1.2. Areas of Disagreement

Within the scope of the proposal, there were no areas of disagreement.

4.2. S1SR Changes for MOC (Secure) (NOV2020 S1SR Q2)

DCC sought views on proposals to amend the S1SR for device behaviours related to MOC (Secure) asking ***“Do you agree with the proposed amendments to the S1SR in Clause 18 of that document, that have been added to describe the device behaviours specific to the MOC Secure devices? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”***.

4.2.1. Respondent View

Four respondents provided a response to this question.

These respondents expressed support for the proposal with one respondent indicating that the amendments provided additional clarity to the current documentation.

4.2.2. Areas of Disagreement

Within the scope of the proposal, there were no areas of disagreement.

4.3. DMVES Changes for S1SR (NOV2020 S1SR Q3)

DCC sought views on proposals to amend the DMVES asking ***“Do you agree with mappings of clauses in Clause 18 of S1SR to the relevant Device Models in DMVES for MOC (Secure)? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.”***.

4.3.1. Respondent View

Four respondents provided a response to this question.

These respondents expressed support for the proposal with one respondent indicating that the amendments provided additional clarity to the current documentation.

4.3.2. Areas of Disagreement

Within the scope of the proposal, there were no areas of disagreement.

4.4. S1SR Regulatory Change Date (NOV2020 S1SR Q4)

DCC sought views on the planned date for the Secretary of State re-designating the S1SR asking ***“Do you agree with the proposed re-designation date of 4 December 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the S1SR using draft notification at Attachment 1?”***.

4.4.1. Respondent View

Four respondents provided a response to this question.

Three respondents agree with the approach to re-designation without further comment.

One respondent agree with the approach to re-designation provided that DCC allowed sufficient time to fully consider the responses. Given the nature of the comments, DCC confirms that there was more than enough time to complete a comprehensive review of the comments prior to submission of this document to the Secretary of State.

4.4.2. Areas of Disagreement

There were no areas of disagreement.

5. Summary of Drafting Changes

The consultation process gave rise to no changes to the drafting. The consultation version of the S1SR was presented as v5.2 against the v5.1 which is a draft FOC version. However, the changes attached to this document are presented against the current version that was recently re-designated and excludes these FOC changes. DCC has aligned the proposed drafting for these matters to reflect the current S1SR drafting as it expects this version to be re-designated prior to FOC.

6. Conclusions

DCC is confident that the version of the 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 S1SR.

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 S1SR and as such further consultation is neither necessary nor appropriate.

It is DCC's view that it has met its SEC obligations.

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

DCC considers that:

- the revised S1SR is defined to a sufficient level of detail for re-designation into the SEC;
- the revised S1SR 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 S1SR is materially complete, and the content is technically accurate.

In summary, DCC considers that the revised S1SR is fit for purpose.

7. Next Steps

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

Following the submission of S1SR to the Secretary of State, DCC expects the Secretary of State to make a decision on whether and when to re-designate the revised S1SR into the regulatory framework. Given this consultation process DCC notes the earliest date that these changes could be re-designated is 4 December 2020 and the latest date is 4 January 2021 without requiring a further consultation on the designation date.

8. Attachments

Attachment	Title
1.	S1SR AM 6.0 draft - clean
2.	S1SR AM 6.0 draft - delta against current version 5.0
3.	Annex A of S1SR AM 6.0 draft - DMVES

Table 2 - Attachments