

SMETS1 Conclusions on TMAD Changes and consultation on re- designation date

DCC Conclusions and Report to Secretary of State on changes to the SMETS1 Transition and Migration Approach Document (TMAD) to support the FOC Cohort, a consequential change in respect of other Cohorts and a consultation on the designation date for this version of the TMAD.

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1. Introduction and Context

The detailed technical and procedural requirements of the migration approach for SMETS1 are set out in the SMETS1 Transition and Migration Approach Document (TMAD). This document is included in the Smart Energy Code¹ (SEC) as Appendix AL and the latest version (9.0) was included in the SEC on 21 December 2020.

DCC issued three separate consultations regarding the TMAD related to FOC:

- 16 October 2020 - <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-response-to-the-consultation-of-25-august-2020-and-further-consultation-on-tmad-for-foc/>; and
- 18 November 2020 - <https://www.smartdcc.co.uk/customer-hub/consultations/smets1-further-tmad-consultation-for-foc/>;
- 20 November 2020 - <https://www.smartdcc.co.uk/customer-hub/consultations/smets1-consultation-extra-tmad-change-for-foc/>.

This document provides a response to these consultations consistent with the regulatory requirements for revising the TMAD for FOC.

DCC also concluded on changes to the SMETS1 Supporting Requirements for FOC and UISS for all cohorts in December 2020². The revised version of the UISS has now been designated. The SMETS1 Supporting Requirements for FOC has been issued for further consultation on 22 January 2021³.

In this document, we are also consulting on the re-designation date of the TMAD on behalf of BEIS. The context and question can be found in section 8. Next Steps.

2. Stakeholder Engagement

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

Stakeholders were invited to respond to the consultation issued on 16 October 2020 by 16:00 on Friday 6 November 2020 using the separate response template that was provided.

Stakeholders were invited to respond to the consultations issued on 18 and 20 November 2020 by 16:00 on Friday 27 November 2020 using the separate response templates that were provided.

On 26 November 2020, DCC held an industry briefing session during which the proposed changes set out in the consultations issued on 18 and 20 November 2020 as well as the proposed changes in a corresponding S1SR consultation were presented. The session was well received with one party expressing appreciation at the efforts of DCC to provide information to industry on the

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

² <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-responses/consultation-response-on-changes-to-the-uiss-smets1-supporting-requirements-document-for-secure/>

³ <https://www.smartdcc.co.uk/customer-hub/consultations/january-2021-consultation-on-further-changes-to-the-smets1-supporting-requirements-document-for-foc/>

changes. None of the parties that were present at the call expressed any reservations about the proposed changes.

2.1. 16 October 2020 Consultation

On 16 October 2020, DCC published the consultation document titled '[SMETS1 Conclusion and Additional Consultation - TMAD for FOC](#)' 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 7.1 delta](#);
- draft text and proposed timescale for the Secretary of State's direction for the re-designation of the TMAD.

2.2. 18 November 2020 Consultation

On 18 November 2020, DCC published the consultation document titled '[SMETS1 – Consultation on changes to the TMAD – further changes for FOC](#)' on the DCC Website and DCC's Service Desk also emailed stakeholders to notify them of its publication.

The scope of the consultation covered two further changes to the TMAD - [SMETS1 Transition and Migration Approach Document AL7.2 draft \(change marked against AL7.1\)](#)

2.3. 20 November 2020 Consultation

On 20 November 2020, DCC published the consultation document titled '[SMETS1 – Consultation on extra change to the TMAD –for FOC](#)' on the DCC Website and DCC's Service Desk also emailed stakeholders to notify them of its publication.

The scope of the consultation covered a further change to the TMAD - [SMETS1 Transition and Migration Approach Document AL7.2X draft \(change marked against AL7.2\)](#)

3. Consultation Questions & Responses

3.1. Questions

The respective consultation templates:

- [SMETS1 Conclusion and Additional Consultation - TMAD for FOC - Response Template](#);
- [SMETS1 – Consultation on changes to the TMAD – further changes for FOC - Response Template](#); and
- [SMETS1 – Consultation on extra change to the TMAD –for FOC - Response Template](#)

presented the consultation questions as set out in Table 1.

Consultation	Number	Question
16 October 2020	FOCa TMAD Q1	Do you agree with the proposed additional changes to the TMAD for FOC? Please provide a rationale for your views.
16 October 2020	FOCa TMAD Q2	Do you agree with the proposed change to the date from 31 December 2020 to 31 December 2021 that TMAD will cease to apply? Please provide a rationale for your views.
16 October 2020	FOCa TMAD Q3	Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views?
16 October 2020	FOCa TMAD Q4	Do you agree with the proposed re-designation date of 13 December 2020 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the TMAD using draft notification at Attachment 1?
18 November 2020	FOCb TMAD Q1	Do you agree with the additional amendments to TMAD for FOC? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views?
20 November 2020	FOCc TMAD Q1	Do you agree with the extra change to the TMAD related to null certificates? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views?

Table 1 – Consultation Questions

3.2. Responses

DCC received a written response from three respondents to the 16 October 2020 consultation on the TMAD.

DCC received a written response from eight respondents to the 18 November 2020 consultation on the TMAD.

DCC received a written response from five respondents to the 20 November 2020 consultation on the TMAD.

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 regulatory obligations require DCC to report on this.

4.1. Further TMAD changes for FOC (FOCa TMAD Q1)

DCC sought views on proposals to amend the TMAD for FOC asking "***Do you agree with the proposed additional changes to the TMAD for FOC? Please provide a rationale for your views.***".

4.1.1. Respondent View

Three respondents provided a response to this question.

One respondent expressed explicit support for the amendment to the TMAD without further comment.

One respondent repeated their concern that Clause 4.49 of the TMAD wasn't required as the obligation is covered by obligations in the MRA and SPAA. DCC had previously concluded that this change was necessary as the requirement was in the MRA but not the SPAA. Given this stakeholder raised this concern again, DCC has investigated this matter further and the lack of a SPAA reference is not the only reason why this Clause was included. DCC can confirm that Clause 4.49 of the TMAD ensures that prepayment functionality is unaffected by the migration and maintained if the device is inherited by other suppliers in the case of a change of supplier event due to detailed implementation issues where GroupID is "EA". Without this obligation, there is the potential that any errors in the prepayment keys may be passed to an energy supplier gaining these meters when in prepayment mode. DCC has engaged with this respondent to clarify the intent.

One respondent provided a few detailed comments on the proposed changes to the TMAD. DCC engaged with this respondent to fully understand their comments on three matters in the TMAD.

This respondent queried the intent of Clause 5.8A of the TMAD. DCC confirms that the purpose of this Clause is to enable DCC to request the SMETS1 SMSO to generate a new MCF in cases where the installation has a file sequencing error, or other error meaning that the Migration of the SMETS1 Installation is stuck i.e. unable to complete Migration and also there an inability to rollback. DCC has amended the TMAD drafting to clarify the intent.

This respondent sought clarity on the requirement set out at row 5.9.10 in Table 5.9 of the TMAD. DCC confirms that the split supply rules that support affiliated suppliers are not currently applicable for FOC and DCC will consult on changes to TMAD when split supply is introduced for FOC. DCC does note however that split supply sites are capable of being migrated prior to this change being introduced, where null certificates are used (as set out in section 4.6 below).

4.1.2. Areas of Disagreement

Following engagement with respondents, there were no areas of disagreement.

4.2. Extending TMAD End Date (FOCa TMAD Q2)

DCC sought views on proposals to adjust the sunset provision such that the TMAD ceases to apply from 31 December 2021 asking ***“Do you agree with the proposed change to the date from 31 December 2020 to 31 December 2021 that TMAD will cease to apply? Please provide a rationale for your views.”***. DCC submitted a conclusions report to the Secretary of State on 10 December 2020 concluding separately on this question (see [SMETS1 Conclusions on TMAD - 31 December 2021 Expiry](#)) and thus it is not reported on further here. The Secretary of State designated a new version of the TMAD which made this change and the new version took effect on 21 December 2020 (v9.0).

4.3. TMAD Legal Drafting for FOC (FOCa TMAD Q3)

DCC sought views on the legal drafting in the TMAD proposed for FOC asking ***“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

Three respondents provided a response to this question.

Two respondents indicated that they had no detailed comments on the TMAD legal drafting. One of these respondents expressed the view that the proposed changes aligned to the requirements set out in the consultation by DCC.

One respondent indicated that it had no further detailed comments other than those provided in response to the questions set out above (see sub-sections 4.1 and 4.2).

4.3.2. Areas of Disagreement

There were no areas of disagreement.

4.4. TMAD Regulatory Change Date (FOCa TMAD Q4)

DCC sought views on the planned date for the Secretary of State re-designating the TMAD being 13 December 2020 (or within one month thereafter) to align with what was, at the time, planned to be the FOC go-live date. Given the delay in go live for the FOC primary release, this matter is no-longer relevant. As part of this consultation response, DCC is seeking views on a proposed re-designation date in Section 8 of this document.

4.5. Limiting Initial Migrations (FOCb TMAD Q1)

DCC sought views on initially Migrating only SMETS1 Installations which do not have the transmission of half hourly consumption data enabled asking ***“Do you agree with the additional amendments to TMAD for FOC? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views?”***

4.5.1. Respondent View

Eight respondents provided a response to this question.

Three respondents provided explicit support for these proposed changes related to preventing transmission of half hourly data.

One respondent, of the three that supported this proposal, indicated it was appropriate given the FOC timeline challenges. This respondent asked DCC to provide a detailed plan and timeline for the resolution of this issue. As described in the consultation document, DCC is urgently working with service providers to address this issue and intends to implement a solution after the 28 February FOC go live through FOC Uplift 2.1 in May 2021, to allow the functionality to be enabled or disabled post Migration. Furthermore, DCC expects to issue a further TMAD consultation in February 2021 to remove these changes to Clauses 4.24, 4.24A, and 4.44B from the TMAD (via a subsequent re-designation) when the solution change is implemented.

A respondent raised concerns relating to the impact of the late changes and the defects that were being identified in testing. The respondent further sought clarity on the scope of FOC Release 1. DCC notes the concerns that have been raised. These concerns appear to be directed at the go-live for FOC and not the content of the consultation. DCC is subject to a rigorous governance process which culminates in a BEIS approval to go-live. Stakeholders have the right to raise these issues during this governance process and DCC is therefore of the opinion that these concerns are best addressed as part of that process. This respondent also stressed it to be important for DCC to engage with Energy Suppliers to provide ongoing insight into the pacing strategy given the scope for migration demand scaling as per the Migration Scaling Methodology. DCC accepts this position and notes that DCC has ongoing engagement with stakeholders on migration plans which includes a monthly stakeholder briefing.

One respondent stressed the need for this temporary measure to be resolved as soon as possible given that distribution network operators should be provided with this data for all enrolled electricity smart meters consistent with their Data Privacy plan. DCC can confirm that the data from electricity smart meters will be available to network operators from the first fix in May 2021 following the initial FOC Go Live. This respondent also highlighted a typographical error in Clause 4.24A which DCC accepts and has corrected.

Three respondents sought confirmation that the resultant removal of access to half-hourly data for network operators was a temporary measure. DCC can confirm that the data will be available to network operators from the first fix due in May 2021, following the initial FOC Go Live as well as the enduring solution. One of these respondents stressed the importance of prompt resolution whilst noting that this short-term restriction may be acceptable as a network operator does not have access to electricity consumption data from SMETS1 ESMEs prior to migration. One of these respondents disagreed in principle with the change as network operators should be provided with this data for all enrolled smart meters consistent with their Data Privacy plan. DCC notes that the data access situation is not made worse for network operators as they do not have access to the data for SMETS1 prior to migration. One of these respondents provided explicit support for these proposed changes but expressed more general concern that DCC does not sufficiently engage with network operators. Whilst not relevant to this consultation, DCC notes the more general concerns related to the extent of engagement with DNOs and will be mindful of this concern moving forward.

Two respondents expressed general concern that this amendment would prevent an electricity supplier from providing half-hourly data (from an enrolled SMETS1 meter) if the end customer requested the data following migration. These respondents highlighted that this situation would conflict with the Standard Licence Condition for Electricity Supply. Notwithstanding their concerns, the first respondent expressed support for the proposed amendment to restrict migrations. The second respondent indicated that the only resolution of this issue prior to the initial fix (in May 2021, following the initial FOC Go Live) would be the early replacement of these

SMETS1 devices with SMETS2. The second respondent also set out the following two requests in their response.

1. **Schedule** – The respondent asked that DCC commit to an implementation schedule for the fix that is delivered promptly following FOC Go Live. DCC can confirm that the fix will be delivered with Uplift 2.1 in May 2021. This respondent also suggested that DCC limit further migrations if the FOC implementation schedule slips further for these matters. DCC is committed to prompt resolution of these matters and considers that it would not be prudent to speculate on a delay FOC delivery at this point.
2. **BEIS / Ofgem** – The respondent expressed a view that the Secretary of State should only re-designate this change to the TMAD once BEIS has received confirmation from Ofgem that energy suppliers would not be held to account to the relevant Supply Licence Condition until the fix is deployed by DCC. DCC highlighted this response to BEIS promptly following receipt.

4.5.2. Areas of Disagreement

There were no areas of disagreement.

4.6. Null Certificates (FOCc TMAD Q1)

DCC sought views on permitting DCC to only Migrate SMETS1 Installations containing Dormant Meters where DCC has received a 'non-null' supplier certificate. This proposed amendment was to limit migrations due to a defect that arose in testing in November 2020. Given the subsequent delay in go live for the FOC primary release, the relevant defect related to null certificates will now be addressed prior to go live for the FOC primary release. On this basis, DCC is concluding that the proposed new Clause 4.32A is no longer required in the TMAD and thus respondent views regarding this matter do not require analysis.

5. Further Alignment Change affecting all Cohorts

A conflict has arisen in relation to two checks in Table 5.10 of the TMAD at rows 10 and 15. This check confirms the Responsible Supplier with relation to the installation/s to be migrated and identifies whether there is a Change of Supply (CoS) event scheduled in that migration window. If a CoS event is scheduled in the migration window, the installation/s scheduled for migration would be removed until the CoS event is complete.

The current TMAD value for these checks is 2 working days and this was changed (from 7 working days) for all cohorts other than FOC via the Secretary of State re-designating the TMAD on 12 November 2020, following a prior consultation process on changes related to CoS dormancy that was concluded on 7 May 2020 ([Con Response TMAD Change of Supplier Dormancy](#)) to enable an expedited migration of dormant installations, such that the Working Day was reduced to 2.

In parallel to this reduction in the value from 7 to 2 for other cohorts, on 25 August 2020 the DCC consulted ([SMETS1 Conclusion and Further Consultation - TMAD for FOC](#)) on adding 7 working days to the value in the then designated version of TMAD from 7 to 15 given the time that may be needed for FOC migrations to complete. The current implementation of this check within the DSP does not allow a different value to be applied for different cohorts (Group IDs).

Consequently, DCC has reviewed these conflicting requirements and has concluded that the combination of these changes should be 9 Working Days to apply in respect of all cohorts from FOC Go Live.

A change to allow different values for different cohorts would not be viable for delivery prior to the planned FOC go-live date, and DCC does not consider this issue to be sufficiently material to warrant such a change in any event. The effect is that for cohorts other than FOC, increasing the check from 2 to 9 days means that migrations will be rejected where a change of supply event is due to take place within the window of Day +2 to Day +9, whereas currently this is not the case.

DCC engaged with the Technical and Business Design Group Enrolment & Adoption (TBDG E&A) subgroup on 20 January 2021 to discuss this variation in the TMAD versions. The subgroup accepted that a risk had been identified in the engagement for the 25 August 2020 consultation that the 2 day timeframe may be increased. It was accepted that this change was reflected in the conclusions for the FOC Further TMAD changes December 2020 without additional consultation.

6. Summary of Drafting Changes

The consultation process and the alignment change referred to in Section 5 gave rise to a limited number of drafting changes (compared to the consultation versions) which are detailed in this section. DCC has also transposed the FOC changes into v9.0 of the TMAD.

There are a few minor drafting changes within the legal drafting to amend typographical errors and improve clarity.

An overview of key changes is presented in Table 2 below. Please note that the Clause references in Table 2 are based on conclusion versions attached to this document.

No.	TMAD Reference	Description and Rationale for Change
1	5.8A	Minor amendment to clarify the intent of the Clause.
2	n/a	Proposed drafting TMAD 4.32A not including in the concluded TMAD as the defect will be addressed prior to go live for the FOC primary release.
3	Various	References to GroupID "EC" are removed as this SMETS1 SMSO is not in the scope of the current FOC go live.
4	Table 5.9	Extra sentence added to the end of the check in row 10 to improve clarity of the check performed.
5	Table 5.10	A change to the check in rows 10 and 15 to be 9 Working Days.
6	4.44B	Minor change to the drafting to include 'all reasonable steps' such that the obligation on Responsible Suppliers aligns to the obligation on DCC in Clause 4.24A.

No.	TMAD Reference	Description and Rationale for Change
7.	5.8	A minor correction has been made to Clause 5.8 as this requirement was meant to be disapplied in terms of the FOC cohort only. An exception for the FOC cohort GroupID "EA" and "EB" has been added to clarify.

Table 2 – Drafting Changes

7. Conclusions

DCC is confident that the versions of the TMAD submitted to the Secretary of State reflects the requirements for document submission.

DCC is of the opinion that it has undertaken 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 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 obligations.

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.

8. Next Steps

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

The previously consulted upon re-designation date for the version of the TMAD to support the FOC capability release going live has now passed. In order to expedite the re-designation of the TMAD in time for the new planned FOC go-live date, DCC is seeking views on behalf of BEIS on a new proposed date for re-designation of the TMAD as well as the draft designation direction which is presented in Attachment 1 of this consultation document for stakeholder consideration. DCC has discussed the re-designation of the TMAD with BEIS and it is proposed that, subject to

timely receipt of DCC’s report and copies of relevant stakeholder responses to this consultation question, BEIS will re-designate the TMAD on 28 February 2021 or as soon as reasonably practicable within one month thereafter.

**TMAD
Q1**

Do you agree with the proposed re-designation date of 28 February 2021 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the TMAD using draft notification at Attachment 1?

9. How to Respond

Please provide responses by 1600 on 04 February 2021 to DCC at consultations@smartdcc.co.uk.

Consultation responses may be published on our website www.smartdcc.co.uk. Please state clearly in writing whether you want all or any part, of your consultation to be treated as confidential. It would be helpful if you could explain to us why you regard the information you have provided as confidential. Please note that responses in their entirety (including any text marked confidential) may be made available to the Department for Business, Energy and Industrial Strategy (BEIS) and the Gas and Electricity Markets Authority (the Authority). Information provided to BEIS or the Authority, including personal information, may be subject to publication or disclosure in accordance with the access to information legislation (primarily the Freedom of Information Act 2000, the Data Protection Act 2018 and the Environmental Information Regulations 2004). If BEIS or the Authority receive a request for disclosure of the information we/they will take full account of your explanation (to the extent provided to them), but we/they cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded by us as a confidentiality request.

If you have any questions about the consultation documents, please contact DCC via consultations@smartdcc.co.uk.

10. Attachments

Attachment	Title
1.	Draft Re-Designation Text
2.	TMAD Draft Direction Text
3.	TMAD AL11.0 draft – clean
4.	TMAD AL11.0 draft - delta against current version AL9.0

Table 3 – Attachments

Attachment 1

This attachment 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 [28 February 2021], 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.