



SMETS1 Conclusions on MAM Changes

DCC Conclusions and Report on changes to the SMETS1
Migration Authorisation Mechanism (MAM)

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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 a consultation regarding the MAM with changes relating to all SMETS1 cohorts.

- 18 December 2020 - <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-s-december-2020-consultation-on-changes-to-the-migration-authorisation-mechanism-mam/>

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

2. Stakeholder Engagement

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

Stakeholders were invited to respond to the consultation issued on 18 December 2020 by 16:00 on Friday 22 January 2021 using the separate response templates that were provided.

DCC Received 5 responses to the consultation which all provided similar feedback. 4 responses were from Large Supplier Parties. DCC posed a question in the consultation related to a number of documentary changes and updates to the MAM supporting materials, set out as Attachment 3, along with comments received and DCC's response to those comments.

3. Consultation Questions & Responses

3.1. Questions

The respective consultation templates:

- [SMETS1 Consultation – Migration Authorisation Mechanism \(MAM2020\) - Response Template;](#)

presented the following consultation questions as set out in Table 1.

Consultation	Number	Question
18 December 2020	FOCa TMAD Q1	Do you agree with the proposed additional changes to the TMAD for FOC? Please provide a rationale for your views.

Table 1 – Consultation Questions

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

3.2. Responses

DCC received a written response from 5 Parties to the consultation on the MAM that closed on 22 January 2021. DCC provided all written responses 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 each 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.

4.1. Changes to the Migration Authorisation Mechanism (MAM_2020_Q1)

DCC sought views on proposals to amend the MAM for all SMETS1 cohorts asking, "***Do you have any comments on changes to the MAM within the scope of this consultation?***".

4.1.1. Respondents View

Five respondents provided a response to this question.

Broadly, respondents were supportive of the proposed changes to the MAM with limited comments. Respondents were supportive of the changes made in MAM supporting documents SMETS1_Migration_Authorisation_v06a.xlsm and SMETS1_Dormant_Meter_Migration_Schedule_Notification_v06.xlsm

One respondent expressed concern on the deletion of the cross reference to TMAD Clause 4.47 and 4.48 noting that there is an express need for an accurate application of appropriate Network Operator Certificate IDs. DCC has removed the direct references to TMAD clause 4.47 and 4.48 to prevent the need for consultation on both documents where changes are only required in one.

DCC clarified this statement with the respondent and agreed that the editorial inclusion at the introduction of the MAM to retain overarching precedence of the TMAD would retain clarity in the document.

DCC agrees that a statement in the introduction on the hierarchy of the documents in relation to the TMAD is beneficial and this change has been made.

One respondent sought clarification on the use of the step at Clause 7.5.3, the process for digitally signing migration files, as the specification may be inefficient. DCC acknowledges there may be efficiencies in modifying this step, however, will retain the current process as stated in the MAM.

4.1.2. Areas of Disagreement

There were no areas of disagreement with the changes proposed to the MAM through this consultation.

5. Summary of Drafting Changes

The consultation sought to align changes to TMAD which are detailed in this section. DCC has also transposed the changes into v3.0 of the MAM.

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

As DCC is will not be migrating installations where GroupID = "EC". DCC will remove references from the MAM accordingly.

An overview of key changes is presented in table 2 below:

No	MAM Reference	Description and Rationale for Change
1.	4	Alignment with the EIS being the 'coordinating supplier' for an installation (see for example CHF and PPMID firmware upgrades). Does not apply for GroupID = "EA", or "EB" or "EC"
2.	5	Alignment with the EIS being the 'coordinating supplier' for an installation (see for example CHF and PPMID firmware upgrades). Does not apply for GroupID = "EA", or "EB" or "EC"
3.	6	Alignment with the EIS being the 'coordinating supplier' for an installation (see for example CHF and PPMID firmware upgrades). Does not apply for GroupID = "EA", or "EB" or "EC"
4.	6	Alignment with the EIS being the 'coordinating supplier' for an installation (see for example CHF and PPMID firmware upgrades). Does not apply for Group ID = "EA", or "EB" or "EC"
5.	6	Clarifies how DCC will inform the responsible supplier that a device has been commissioned and under what circumstances DCC will be able to associate the responsible supplier's certificates with devices during migration.
6.	6	Clarifies who can do what. Does not apply where GroupID = "EA", or "EB" or "EC"
7.	7.2.2	Clarification as suppliers may have more than one EUID and may use them for a variety of purposes that are not consistent across suppliers
8.	7.2.2	Clarification of how the same supplier party is identified based on the User ID. The two octets referred to aren't the Party ID. However, they are unique to each SEC party

No	MAM Reference	Description and Rationale for Change
9.	7.3.2	Added following some SMSO data being passed to DCC exactly as provided by the supplier to the SMSO rather than aligned to industry data standards. Applies to DCC. Post processing of the MAM
10.	7.4.2	Added following some SMSO data being passed to DCC exactly as provided by the supplier to the SMSO rather than aligned to industry data standards. Same as above. Applies to DCC. Post processing MAM
11.	7.3.4 7.4.4 7.5.2	<p>Changed the Excel files such that they are not embedded in the document but provided on the DCC website.</p> <p>The latest versions are provided alongside this consultation where the files that have previously been changed by DCC but not subject to previous consultation.</p> <p><i>SMETS1_Migration_Authorisation_v06a.xlsm</i></p> <p><i>SMETS1_Dormant_Meter_Migration_Schedule_Notification_v06.xlsm</i></p>
12.	Introduction	For clarity, any provision within the MAM is secondary to provisions of the TMAD. Any detail remains in the TMAD and is not repeated here.

Table 2 – Drafting Changes

6. Conclusions and Next Steps

DCC is confident that the version of the MAM meets the requirements set out in Clause 4.41 of the TMAD and is fit for purpose.

DCC is of the view that it has met its obligations set out in Clause 4.41 of the TMAD having consulted in line with this Clause. DCC has, where necessary, addressed the comments that have been received from industry and there are no material disputes that have not been resolved.

The MAM is in line with the overall solution design for the SMETS1 Service and other relevant documents.

DCC considers that the MAM is defined to a sufficient level of detail to meet the requirements of Clause 4.41 of the TMAD. It is DCC's view that the documents deliver the requirements specified in Clause 4.41 of the TMAD, is materially complete, and the content is technically accurate.

In terms of Clause 4.41 of TMAD, DCC intends to have the MAM come into effect on the 18th of February 2021. In terms of Clause 4.42 of TMAD, in the period prior to the date on which the MAM comes into effect any Supplier Party may object to the MAM by referring the matter to the Secretary of State, which should be sent to the following email address:

Smets1_appeals@beis.gov.uk.

7. Attachments

Attachment	Title
1.	MAM v3.0 draft – clean
2.	MAM v3.0 - delta against current version v2.1
3.	SMETS1_Migration_Authorisation_v06a.xlsm
4.	SMETS1_Dormant_Meter_Migration_Schedule_Notification_v06.xlsm

Table 3 - Attachments