



SMETS1 Conclusions on changes to the SMETS1 Supporting Requirements

**DCC Conclusions and Report to Secretary of State on
changes to the SMETS 1 Supporting Requirements (S1SR)
to support Uplift 2.0 for the FOC Cohort.**

Date: 15 March 2021

Author: consultations@smartdcc.co.uk

Classification: DCC Public

Table of Contents

1. Introduction and Context	3
2. Consultation Questions & Responses	3
2.1. Questions	3
2.2. Responses	3
3. Analysis of Responses.....	4
3.1. S1SR Question 1	4
3.1.1. Respondent View.....	4
3.1.2. DCC Response	4
3.1.3. Areas of Disagreement	5
3.2. S1SR Question 2	5
3.2.1. Respondent View.....	5
3.2.2. Areas of Disagreement	5
3.3. S1SR Question 3	5
3.3.1. Respondent View.....	5
3.3.2. Areas of Disagreement	5
4. Conclusions.....	5
5. Next Steps	6
6. Attachments	6

1. Introduction and Context

In the initial stages of the smart meter roll-out across Great Britain, a number of energy suppliers installed first generation smart metering devices (known as SMETS1 devices), in households and small/medium non domestic premises. SMETS1 devices installed by one energy supplier, however, are not always interoperable with and supported by the systems used by another supplier. The Data Communications Company (DCC) has developed a plan and designed a solution for the incorporation of such devices into its national network. It provides important shared benefits for industry and consumers and intends to offer the ability for SMETS1 consumers to maintain their smart services following a decision to switch suppliers.

The DCC solution relies on a common DCC User interface, defined in the DCC User Interface Specification (DUIS) for users of both SMETS1 and SMETS2 devices. The SMETS1 Supporting Requirements (S1SR) – Appendix AM of the Smart Energy Code (SEC), 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. The latest version of the SMETS1 Supporting Requirements came into effect on 28 February 2021.

On 17 February 2021, DCC consulted on changes to the S1SR to make provision for device specific behaviours in relation to Uplift 2.0 of the FOC cohort, which consultation closed on 05 March 2021.

This document considers the responses that were received to this consultation consistent with the regulatory requirements for revising the S1SR.

2. Consultation Questions & Responses

2.1. Questions

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

S1SR Q1	Do you agree with the proposed amendments to the SMETS1 Supporting Requirements Document (S1SR) in Section 18 of that document, that have been added to describe the device behaviour specific relevant to the FOC devices?
S1SR Q2	Do you agree with mappings of clauses in Section 18 of S1SR to the relevant Device Models in DMVES?
S1SR Q3	Do you agree with the proposed re-designation date of 23 March 2021 (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

2.2. Responses

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

DCC provided all written responses to the Secretary of State.

3. Analysis of Responses

DCC has analysed the feedback provided and views of stakeholders. Subject matter experts within DCC have reviewed every response.

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;
- where appropriate a DCC response; and
- areas where DCC disagrees with the view presented by respondents, as the regulation requirements require DCC to report on this.

3.1. S1SR Question 1

DCC sought views on proposals to amend the S1SR for FOC asking ***“Do you agree with the proposed amendments to the SMETS1 Supporting Requirements Document (S1SR) in Section 18 of that document, that have been added to describe the device behaviour specific relevant to the FOC devices?”***.

3.1.1. Respondent View

DCC received five responses to this consultation. Four of these respondents did not express concern with the proposed changes, however, two of these four respondents had comments that DCC will address in this section. The fifth respondent disagreed with a number of changes, which are dealt with in this section.

A respondent was concerned that by including certain meter behaviours in the S1SR, particularly around the management of price scalars and debt recover rates, these undesirable behaviours were accepted and therefore perpetuated. Additionally, the respondent noted that they thought the current drafting around debt recovery rates would inhibit their customer debt management processes.

Two other respondents commented further in the price scalar issue, noting concerns that it constrained Supplier charging options.

A respondent queried the drafting of Clause 18.9(c) and sought clarification of the intention of the clause.

A respondent raised a concern with the drafting in Clauses 18.1(v) and 18.5(gg) and identified a typographical error in 18.9(c).

3.1.2. DCC Response

In general, one of the purposes of S1SR is to identify and document instances where devices operate differently to SMETS2 devices (as DUIS is the common interface) where it becomes aware of such differences.

In respect of the price scalar drafting, the S1SR provides clarity to Users on how these devices behave differently at present. Where possible DCC seeks to mitigate any impacts to Users through controls within its systems, and DCC will continue to look to do that in this case, and

where appropriate will bring forward amended drafting to reflect any mitigations it may be able to implement in a revised version of S1SR.

In respect of the Debt Recovery Rates drafting, DCC can confirm that the drafting has been amended following confirmation that Debt Recovery Rates in Clause 18.7(q) do work independently.

The DCC has revised the drafting of clauses 18.9(c), 18.1(v), 18.5(gg) and 18.8(c) to correct ambiguous or incorrect drafting.

DCC has revised the drafting of clauses

3.1.3. Areas of Disagreement

DCC is of the view that it has addressed the concerns that have been raised in the consultation and that there are no areas of disagreement with the proposed changes.

3.2. S1SR Question 2

DCC sought views on proposals to amend the DMVES asking: **“Do you agree with mappings of clauses in Section 18 of S1SR to the relevant Device Models in DMVES?”**.

3.2.1. Respondent View

Four respondents agreed with this question. One respondent indicated that they could not comment on the link between the device model and the requirement, however they agreed with the mappings in DMVES.

3.2.2. Areas of Disagreement

DCC is of the view that there were no areas of disagreement with the proposed changes.

3.3. S1SR Question 3

DCC sought views on proposals to re-designate the S1SR asking: **“Do you agree with the proposed re-designation date of 23 March 2021 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the S1SR using draft notification at Attachment 1?”**.

3.3.1. Respondent View

Five respondents agreed with the proposed date, with one indicating that their agreement was contingent on the resolution of the issues that they raised being addressed.

3.3.2. Areas of Disagreement

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

4. Conclusions

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. 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.

5. Next Steps

DCC will submit the updated version of S1SR to the Secretary of State on 15 March 2021 and anticipates that the Secretary of State will re-designate the S1SR into the SEC on 23 March 2021.

6. Attachments

Attachment 1: SEC Appendix AM SMETS1 Supporting Requirement – clean

Attachment 2: SEC Appendix AM SMETS1 Supporting Requirement – redlined

Attachment 3: SEC Appendix AM Annex A Device Model Variations to Equivalent Steps Matrix