

SMETS1 Conclusions on TMAD Changes for FOC Uplift 2.0 and Uplift 2.1

DCC Conclusions and Report to Secretary of State on
changes to the SMETS1 Transition and Migration
Approach Document (TMAD) to support the FOC Cohort
and one amendment affecting all Cohorts

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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 (AL11.0) was included in the SEC on 26 February 2021.

On 5 February 2021, DCC issued a consultation² for the modifications to the TMAD related to Uplift 2.0 and Uplift 2.1 in support of the FOC cohort and also one amendment affecting all cohorts. The consultation also included draft text and proposed timescale for the Secretary of State's direction for the re-designation of the TMAD.

This document provides a response 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 proposed revisions to the TMAD.

Stakeholders were invited to respond to the consultation ([Consultation FOC TMAD Uplift 2.0 and 2.1](#)) issued on 5 February 2021 by 16:00 on Friday 26 February 2021 using the separate response template that was provided.

The scope of the consultation covered changes to the TMAD - [SMETS1 - Transition and Migration Approach Document AL11.1 draft \(change marked against AL11.0\)](#).

3. Consultation Questions & Responses

3.1. Questions

The consultation template [SMETS1 – Consultation on change to TMAD FOC Uplift 2.0 and 2.1 - Response Template](#) presented the consultation questions as set out in Table 1.

Consultation	Number	Question
5 February 2021	FOC_TMAD_U20_21 Q1	Do you agree with the proposed changes to the TMAD for FOC Uplifts 2.0 and 2.1? Please provide a rationale for your views
5 February 2021	FOC_TMAD_U20_21 Q2	Do you agree with the proposed re-designation date of 23 March 2021 for Uplift 2.0 and the change applicable to all cohorts (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the TMAD using draft notification at Attachment 1?
5 February 2021	FOC_TMAD_U20_21 Q3	Do you agree with the proposed re-designation date of 18 May 2021 for Uplift 2.1 (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the TMAD using draft notification at Attachment 1?

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

² <https://www.smartdcc.co.uk/customer-hub/consultations/dcc-consultation-on-tmad-changes-for-foc-uplift-20-and-uplift-21/>.

3.2. Responses

DCC received a written response from three respondents to the 5 February 2021 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 including:

- 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 (FOC Uplift 2.0 and Uplift 2.1 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.***".

All three respondents provided a response to this question.

Two respondents agreed to the proposed changes, noting that there was no explicit concerns or comment on the proposals for either Uplift 2.0 or Uplift 2.1.

One respondent agreed to changes but noted a minor error in Table 15.9 proposing that the new step should be labelled '15.9.4a.X' rather than '15.9.4a' which the DCC agree should be corrected.

There were no areas of disagreement.

4.2. Proposed TMAD Redesignation Date (FOC Uplift 2.0 TMAD Q2)

DCC sought views the redesignation date for the TMAD in line with the changes proposed for Uplift 2.0 asking "***Do you agree with the proposed re-designation date of 23 March 2021 for Uplift 2.0 and the change applicable to all cohorts (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the TMAD using draft notification at Attachment 1?***".

All three respondents provided a response to this question.

All three respondents agreed that this date was appropriate. One respondent added the caveat as long as sufficient time was given to the resolution of any issues or commentary through the consultation process, the timing was appropriate.

There were no areas of disagreement.

4.3. Proposed TMAD Re-Designation Date (FOC Uplift 2.1 TMAD Q3)

DCC sought views the redesignation date for the TMAD in line with the changes proposed for Uplift 2.1 asking ***“Do you agree with the proposed re-designation date of 18 May 2021 for Uplift 2.1 and the change applicable to all cohorts (or, if necessary, as soon as reasonably practicable within one month thereafter) for the updates to the TMAD using draft notification at Attachment 1?”***

All three respondents provided a response to this question.

All three respondents agreed that this date was appropriate without further comment.

There were no areas of disagreement.

5. Summary of Drafting Changes

The consultation process and the alignment change referred to in Section 5 gave rise to one drafting change which is detailed in this section.

Given that there are differing dates for re-designation of Uplift 2.0 and Uplift 2.1, DCC has now transposed the consulted upon changes into separate versions of the TMAD suitable for each group of changes as follows:

- TMAD AL12.0 covers changes for Uplift 2.0 against the current TMAD (AL11.0); and
- TMAD AL13.0 covers changes for Uplift 2.1 against TMAD (AL12.0).

Also, 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	TMAD AL13.0 (Uplift 2.1) Table 15.9	The new step is labelled 15.9.4a.X rather than 15.9.4a which aligns to the drafting in the rest of the steps in Table 15.9
2	TMAD AL13.0 (Uplift 2.1) Clause 4.24	An exception referring to the deleted Clause 4.24A was removed from the Clause 4.24.

6. Conclusions

DCC is confident that both versions of the TMAD submitted to the Secretary of State reflect 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.

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

DCC considers that:

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

In summary, DCC considers that these revised TMADs are fit for purpose.

7. Next Steps

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

For TMAD AL12.0 (related to Uplift 2.0), DCC expects the Secretary of State to make a decision on whether and when to re-designate the revised TMAD AL12.0 into the regulatory framework for Uplift 2.0. Given this consultation process DCC notes the earliest date that these changes could be re-designated is 23 March 2021 and the latest date is 23 April 2021 without requiring a further consultation on the designation date.

For TMAD AL13.0 (related to Uplift 2.1), DCC expects the Secretary of State to make a decision on whether and when to re-designate the revised TMAD AL13.0 into the regulatory framework for Uplift 2.1. Given this consultation process, DCC notes the earliest date that these changes could be re-designated is 18 May 2021 and the latest date is 18 June 2021 without requiring a further consultation on the designation date.

8. Attachments

Attachment	Title
1.	TMAD AL12.0 draft – clean (Uplift 2.0)
2.	TMAD AL12.0 draft - delta against current version AL11.0 (Uplift 2.0)

Attachment	Title
3.	TMAD AL13.0 draft – clean (Uplift 2.1)
4.	TMAD AL13.0 draft - delta against current version AL12.0 (Uplift 2.1)

Table 3 - Attachments