

SMETS1 Improvement Conclusions 1 - TMAD

DCC Conclusions on migration process improvement via changes to the Transition and Migration Approach Document (TMAD)

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1. Introduction and Context

A number of energy suppliers have installed first generation smart devices (known as SMETS1 devices) in consumers' premises across Great Britain. The Data Communications Company (DCC) has designed a solution for the enrolment of SMETS1 devices into its network. Part of DCC's plan to deliver SMETS1 services involves a detailed approach for migrating SMETS1 Installations into DCC's systems. The detailed technical and procedural requirements of this approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD) which was designated by the Secretary of State on 28 July 2019 and included in the Smart Energy Code (SEC) from version 6.14 onwards as Appendix AL of the SEC. The current TMAD was designated by the Secretary of State on 14 June 2021 and included in the Smart Energy Code (SEC) as version 13 Appendix AL of the SEC.

On 20 May 2021, DCC consulted on proposed process improvement changes which included changes to the TMAD¹. This document provides a response to that consultation consistent with the regulatory requirements for amending the TMAD. The consultation also included changes to two TMAD child documents, the Migration Authorisation Mechanism (MAM) and Migration Scaling Methodology (MSM). The conclusion to these child document will be covered by a separate conclusions document given the differing regulatory requirements.

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 20 May 2021 by 16:00 on Thursday 10 June 2021 using the response template² that was provided. DCC received two responses to the consultation.

During the consultation period, DCC also held a short teleconference with an Energy Supplier that sought clarification from DCC on the proposed improvements. This Energy Supplier did not respond to the consultation but has confirmed to DCC that the changes would not be problematic for their business.

3. Consultation Questions & Responses

3.1. Questions

The consultation posed the following questions related to the proposed changes to the TMAD:

Improvement
Q1Do you have any comments on changes to the TMAD within the scope of this
consultation?

¹ <u>https://www.smartdcc.co.uk/customer-engagement/smets1-improvement-consultation/</u>

² https://www.smartdcc.co.uk/media/5970/smets1 improvements consultation response template.docx

Improvement Q4 Do you agree with the proposed re-designation date of 2 July 2021 for updates to the TMAD related to the migration process improvements?

Table 1 – Consultation Questions

3.2. Responses

DCC received a written response from two respondents regarding the TMAD changes.

4. Analysis of Responses

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

DCC has structured the analysis of responses by question, providing an overview of the comments received and DCC's response thereto.

4.1. Changes to the TMAD (Improvements Q1)

DCC sought views on proposals to amend the TMAD asking: "**Do you have any comments** on changes to the TMAD within the scope of this consultation?".

4.1.1. Respondents Comments

Two respondents provided a supportive response to this question.

One respondent expressed general support for the proposals.

One respondent expressed explicit support for the proposed reduction in notice period for the daily migration demand. This respondent also highlighted that their processing of migration reports from DCC has been automated and thus sought confirmation that any changes to the data specification, ordering or formatting within the Migration Reporting Regime (MRR) would be subject to appropriate consultation and not considered as a minor change pursuant to the proposed Clause 4.45 (a) (ii) of the TMAD. DCC fully understands the respondent's concern related to data processing. At present DCC has no plans to amend any of the report formats, ordering, or data specification would not be interpreted by DCC as a minor change and thus would require appropriate consultation consistent with the proposed Clause 4.45 (a) (i) of the TMAD.

4.1.2. Areas of Disagreement

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

4.2. Secretary of State Re-designation (Improvement Q4)

DCC sought views on the planned date for the Secretary of State re-designating the TMAD asking: **"Do you agree with the proposed re-designation date of 2 July 2021 for updates to the TMAD related to the migration process improvements?"**.

4.2.1. Respondents Comments

Two respondents provided a response to this question.

One respondent supported the proposed date for the Secretary of State to re-designate the TMAD.

One respondent supported the proposed date for the Secretary of State to re-designate the TMAD provided DCC has sufficient time to appropriately review the responses received. DCC can confirm that there has been adequate time to consider the responses to the consultation.

4.2.2. Areas of Disagreement

There were no areas of disagreement with the date proposed for TMAD re-designation.

5. Summary of Drafting Changes

There are no material drafting changes resulting from this consultation process but some minor changes to the proposed drafting to improve clarity and provide a publication notice for the MEHRS. The TMAD version used for the consultation was based on v12. However there has been a housekeeping change to the TMAD published as v13 on 14 June 2021. Thus, the changes proposed within this conclusion are presented as v14 as a delta version against the latest v13.

6. 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.

7. Next Steps

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

DCC expects the Secretary of State to make a decision on whether and when to redesignate the revised TMAD v14.0 into the regulatory framework for these SMETS1 improvements. Given this consultation process DCC notes the earliest date that these changes could be re-designated is 2 July 2021 and the latest date is 2 August 2021 without requiring a further consultation on the designation date.

8. Attachments

| Attachment | Title |
|------------|---|
| 1. | TMAD V14.0 draft - clean |
| 2. | TMAD V14.0 draft - delta against current version V13.0 |
| 3. | TMAD V14.0 draft - delta against consultation version V12.z |

Table 2 - Attachments