

SMETS1 Consultation - Unblocking Migrations 1

A SMETS1 consultation on a proposal by DCC to amend the regulatory framework to allow Migration of certain categories of SMETS1 Installations pursuant to Clause 1.4 of the SMETS1 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 the migration approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD). The SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) sets out the rights and obligations for a range of SMETS1 testing matters including Systems Integration Testing (SIT) and the DMCT Process and also provides the framework for the Migration Testing Approach Document (MTAD) which sets out the rights and obligations for Migration Testing (MT). The SMETS1 SVTAD is Appendix AK of the Smart Energy Code¹ (SEC) and the TMAD is Appendix AL of the SEC. The latest version of the SEC was published on 16 June 2021 as v39.0.

In December 2020, the Department for Business Energy and Industrial Strategy (BEIS) consulted² on changes to the TMAD to provide a framework to develop options for the Migration of SMETS1 Installations comprising Device Model Combinations (DMCs) which DCC consider currently blocked. In February 2021, BEIS concluded³ on these changes, introducing Clauses 1.4 to 1.9 in the TMAD to support consideration of SMETS1 Installations currently blocked for Migration.

This consultation is proposing regulatory changes that will enable certain categories of SMETS1 Installation to be Migrated.

2. Background to Maximising Migrations

The migration of SMETS1 Installations into the DCC System is progressing across the range of cohorts and all eligible meter families. Based on available data at the time of publication, DCC has migrated around 2.5 million SMETS1 Installations, thereby facilitating interoperable smart services to these energy customers. However, DCC has identified a number of circumstances where certain categories of SMETS1 Installations are unable to become eligible for, or successfully complete Migration for a range of reasons, which DCC refers collectively to as 'blocked' SMETS1 Installations. In order to facilitate the migration of these blocked SMETS1 Installations, BEIS has amended the TMAD (new Clauses 1.4 to 1.9) to include additional obligations on DCC to take steps to resolve such matters.

These TMAD clauses provide two routes to address such blocked SMETS1 Installations:

- 'Unblocking' - Clause 1.4 of the TMAD places an obligation on DCC to bring forward changes to the SEC to facilitate successful Migration; and

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

² The BEIS consultation is available via <https://smartenergycodecompany.co.uk/latest-news/secretary-of-state-direction-on-the-smets1-tmad-and-further-smets1-tmad-consultation/>

³ The BEIS conclusion is available via <https://smartenergycodecompany.co.uk/latest-news/sec-v35-0-implemented-to-support-the-dcc-smets1-service/>

- 'Excluding' - Clause 1.5 of the TMAD places an obligation on DCC to set out where it considers that it will not be possible to facilitate successful Migration as:
 - there are technical or operational barriers to successful Migration; or
 - it would be economically inefficient to implement changes to support successful Migration.

The remaining new TMAD clauses provide a prescribed regulatory approach for stakeholder consultation on DCC's proposals (Unblocking / Excluding) and subsequent provision of a conclusion report to the Secretary of State. There are also requirements for notification to stakeholders in the circumstances that the Secretary of State does not object to DCC's recommended approach regarding exclusions.

DCC is assessing the SMETS1 Installations presently blocked for migration and in some cases, DCC has been able to take steps to unblock these migrations without the need for a regulatory change e.g. by correcting data errors between registration data in the SMETS1 SMSO and the DCC (with support from the Responsible Supplier where required). DCC is presently continuing with such unblocking activities where regulatory changes is not required.

In order to progress these blocked SMETS1 Installations, DCC is planning a number of consultations during 2021. This document is the first such consultation; proposing changes to the regulatory framework that will allow certain categories of SMETS1 Installations to be unblocked and thus capable of Migration following the appropriate regulatory change (and DCC solution updates where required). A second consultation is planned for later in the year, and will propose the exclusion of certain categories of SMETS1 Installation that are currently blocked from the scope of Migration and where DCC has not been able to find a viable migration solution. DCC's investigation into blocked SMETS1 Installations is on-going, and Migration of SMETS1 Installations in the FOC cohort has only recently started. Further consultations are envisaged later this year to address remaining SMETS1 Installations (including any new blocking issues that may arise), as DCC progresses towards completion of Migration for all eligible SMETS1 Installations.

3. Proposed Unblocking Changes

Pursuant to Clause 1.4 of TMAD (related to unblocking), this section of the document contains a number of sub-sections, each setting out a discrete change where DCC considers that the SMETS1 Installations can be included for Migration following changes to the regulatory framework. Each sub-section indicates whether or not changes to the DCC Systems are required; this distinction is included as any changes to the DCC Systems will need to be tested via as a SMETS1 Uplift (pursuant to Clause 21 of the SMETS1 SVTAD).

Stakeholder views are sought on each discrete change in the following subsections.

3.1. SMETS1 PPMID Definition Change - no change to DCC Systems

Based on the current SEC definitions, in-home display devices are 'SMETS1 PPMIDs' if they can be upgraded to a new firmware were one to be provided. These are the relevant definitions from Section A of the SEC.

SMETS1 IHD has the meaning given to the expression 'IHD' in SMETS1.

SMETS1 PPMID means a SMETS1 IHD that is capable of upgrading its Firmware in response to an Instruction sent over the SMETS1 SM WAN.

DCC has identified a number of different SMETS1 in-home display Devices where Migration (as a SMETS1 PPMID) is problematic and thus the relevant SMETS1 Installations are blocked. This situation impacts across all SMETS1 Installations i.e. Dormant / Active / Mixed that have such PPMIDs. In some circumstances, these devices are no longer supported by their manufacturer, and there are also some devices where the firmware version data provided by the relevant SMETS1 SMSO is unrecognised as a valid identifier. DCC and the manufacturers have jointly undertaken extensive assessment of these matters but have been unable to obtain a satisfactory resolution. The impact of these issues is that, for these devices, DCC is unable to obtain the relevant information to allow these devices to be added to the Eligible Products Combination List (EPCL) (and subsequently the Certified Products Combination List (CPL)) as a SMETS1 PPMID which prevents DCC from proposing EPCL entries comprising DMCs that contain such devices. DCC's current assessment is that approximately 81,000 SMETS1 Installations are currently blocked from Migration due to these circumstances.

DCC is proposing to unblock Migration of the relevant SMETS1 Installations by classifying these SMETS1 consumer devices as a SMETS1 IHD as DCC has the required information for progressing the resultant DMC through the DMCT Process as there will not be a SMETS1 PPMID listed (and thus there are no CPL data requirements). These entries on the EPCL are not expected to require testing and instead are expected to be added to the EPCL via the substantive equivalence process (to an existing entry on the EPCL where the device models are the same except that the DMC is without a SMETS1 PPMID attached); noting that DCC envisages that some changes to the substantive equivalence guidance note may be required. For reference the current guidance note is available via <https://www.smartdccc.co.uk/document-centre/?filter=2081>. DCC explored an alternative approach to the Migration of such SMETS1 Installations by ignoring the in-home display Devices completely. However, this approach would require a change within the SMETS1 SMSO Service Provider systems to allow these devices to be ignored which will take time / resource to progress. Additionally, ignoring these devices would mean that they would not be identified within the Smart Metering Inventory, whereas these devices would be visible in the Smart Metering Inventory as a SMETS1 IHD.

In order to address this matter, it is proposed that the definition for SMETS1 PPMID is varied by an addition to Clause 3.1 (g) of the TMAD to exclude any in home display devices from being classified as a SMETS1 PPMID where the EPCL data is not obtainable by the DCC when they are being assessed under the DMCT Process.

SMETS1 PPMID means a SMETS1 IHD that is capable of upgrading its Firmware in response to an Instruction sent over the SMETS1 SM WAN (except such Devices where, during assessment by the DCC under the DMCT Process (pursuant to Clause 20.4 and 20.5 of Appendix AK), the DCC is unable to obtain from either the Supplier Party or the SMETS1 SMSO the set of data for the SMETS1 PPMID Device Model that is required to enable the relevant entry to be made as a SMETS1 PPMID on the list of SMETS1 Eligible Product Combinations).

There is also a consequential amendment to the SMETS1 SVTAD to provide DCC with the ability to:

- a) proceed with the DMCT Process in respect of DMCs submitted by Suppliers in respect of their Active Meters once it has been determined by the DCC that such DMC comprises of a SMETS1 IHD Device Model rather than a SMETS1 PPMID,
- b) to notify Suppliers that made such DMC submissions to DCC of the reclassification of the Device Model within the DMC, and
- c) to provide a right of appeal if that Supplier disagrees with DCC's reclassification.

20.5A Where a Device Model included as a SMETS1 PPMID in a Device Model Combination for the purposes of the DMCT Process is determined by the DCC to be a SMETS1 IHD (on the basis that the DCC is unable to obtain from either the Supplier Party or the SMETS1 SMSO the set of data for the SMETS1 PPMID Device Model that is required to enable the relevant entry to be made as a SMETS1 PPMID on the list of SMETS1 Eligible Product Combinations), then the DCC shall proceed with the DMCT Process on the basis that the Device Model is deemed to have been included in the DMCT Process as a SMETS1 IHD. Where the Device Model was included as a SMETS1 PPMID in a Device Model Combination by a Supplier Party pursuant to Clause 20.2, the DCC shall promptly notify any Supplier Party of the reclassification of the SMETS1 PPMID Device Model as a SMETS1 IHD, together with the associated rationale. Where any Supplier Party disagrees with the reclassification to a SMETS1 IHD, the matter may be referred to the Secretary of State within 10 Working Days of the DCC's notification to that Supplier Party, and the decision of the Secretary of State shall be final and binding for the purposes of this Code.

There are also minor consequential changes to Clause 20.5 and Clause 20.6 to reference the new Clause 20.5A

Unblocking 1 Q1

Do you agree with DCC's proposal to amend the TMAD to vary Section A of the SEC for the purposes of Migration and the consequential change to the SMETS1 SVTAD to unblock Migration for SMETS1 Installations by migrating as a SMETS1 IHD rather than a SMETS1 PPMID? Please provide a rationale for your views.

3.2. Increasing GSME check period for GT01 for IOC & MOC (MDS) – change to DCC Systems required

For the IOC, MOC (MDS), and MOC (Secure) cohorts, the main source of migration failures is related to a GT01 check on the extent of communication between the Communications Hub and the GSME. This GT01 check is not part of the migration process for the FOC cohort. This check is to establish whether the Communications Hub and the GSME have communicated in the last 24 hours and a failure of this check blocks the Migration of the SMETS1 Installation from proceeding. DCC's analysis indicates that extending this check to 72 hours is expected to allow approximately 20% of failed migrations to proceed across IOC and MOC (MDS). It is estimated that this equate to approximately 5,000 SMETS1 Installations. However, DCC's analysis indicates that extending the check to 72 hours has no material benefit for MOC (Secure) as DCC's analysis indicates that extending this check to 72 hours is expected to allow approximately 0.85% of failed migrations to

proceed across MOC (Secure), as typically intermittent communication with the GSME is not a significant issue for this cohort.

The TMAD GT01 checks are in Appendices which are categorised by GroupID. For IOC and MOC (MDS) this is set out in Table A3 within Appendix A (Device installation – For GroupIDs “AA”, “BA”, “CA” and “CB”). Within Table A3, step 4 confirms that the GSME’s Device ID is on that CHF Whitelist and that the GSME has communicated in the last 24 hours. DCC is proposing a simple TMAD amendment to the GT01 check to extend the time from 24 hrs to 72 hrs as follows:

Table A3 GT01 Step 4

confirm that the GSME’s Device ID is on that CHF Whitelist and that the GSME has communicated in the last ~~24~~⁷² hours.

The extension to this check requires a change to the DCC system which will be implemented following testing via a SMETS1 Uplift with the required test governance via TAG. As this is a minor change, DCC is planning for this to be deployed on 12 October 2021 as part of the October maintenance release.

Unblocking 1 Q2

Do you agree with DCC’s proposal to amend the TMAD to unblock Migration for SMETS1 Installations by extending the GT01 check time from 24 hours to 72 hours for IOC and MOC (MDS)? Please provide a rationale for your views.

3.3. Removing migration check for iGT issue – change to DCC Systems required

At present there are approximately 380,000 SMETS1 Installations where the premises is connected to an independent Gas Transporter (iGT), which are a mixture of both Active Meters and Dormant Meters. DCC analysis shows that these SMETS1 Installations are blocked as a situation has arisen due to a change in registration data provided to the DCC. Xoserve is the Registration Data Provider for Gas Transporters, providing data updates to the DSP. As part of Xoserve’s Q4 2019 update, the process to update and maintain iGT details are now omitted from the data provided to the DCC and is replaced by the master GT (Gas Transporter) details instead. This means that when reporting the registration data to DCC the iGT is being represented as the main Gas Transporter for the region which is incorrect. This then causes the Migrations to fail as the relevant network certificate provided by the Energy Supplier is not valid based on the registration data. This issue will be resolved by the implementation of changes related to faster switching in the Q3 2022, however DCC is proposing this change to the TMAD in order to expedite unblocking these SMETS1 Installations. DCC can identify impacted SMETS1 Installations based on the MPRN as these are provided by the Independent Gas Transporters’ Uniform Network Code¹.

DCC is proposing to remove the check against registration data where the Supply Meter Point is connected to an iGT network for SMETS1 migrations to prevent checking of the iGT certificates as per the change to Table 5.10 proposed below.

¹ <https://www.igt-unc.co.uk/igt-unc-related-documents/igt-mprn-management-allocation-process/>

Table 5.10 Step 5.10.17

Unless the value of the CriticalNetworkOperatorCertificateID is the Null Certificate ID [or the Gas Transporter is an independent Gas Transporter](#), for the GPF, confirm, that, according to Registration Data, the Gas Network Party is the Gas Transporter in relation to the MPxN specified in the GSME element.

Failure to make this change means that DCC and Responsible suppliers will not be able to migrate a SMETS1 Installation connected to an iGT network until Faster Switching comes into production i.e. Q3 2022. This change to the certificate check requires a change to the DCC System which will be implemented following testing via a SMETS1 Uplift with the required test governance via TAG. As this is a minor change, DCC is planning for this to be deployed on 12 October 2021 as part of the October maintenance release.

Unlocking 1 Q3

Do you agree with DCC's proposal to amend the TMAD check to unblock Migration for SMETS1 Installations where there is an IGT? Please provide a rationale for your views.

4. Next Steps

Following the closure of this consultation, DCC will take into account respondents' views, and, subject to the consultation responses received, submit to BEIS an amended version of the TMAD, and the SMETS1 SVTAD, that it considers suitable for re-designation into the SEC by the Secretary of State.

DCC is aiming to provide a conclusions report to BEIS no later than 22 July 2021.

Where no changes to the DCC Systems are required (for the definition of SMETS1 PPMID), DCC has discussed the re-designation of the TMAD and SMETS1 SVTAD, with BEIS and it is proposed that, subject to timely receipt of DCC's report, copies of relevant stakeholder responses to this consultation, and the outcome of the consultation exercise, BEIS will re-designate the TMAD and SMETS1 SVTAD, on 29 July 2021 or as soon as reasonably practicable within one month.

Where changes to the DCC Systems are required for the GT01 check in Table A3, DCC has discussed the re-designation of the TMAD with BEIS and it is proposed that, subject to timely receipt of DCC's report, copies of relevant stakeholder responses to this consultation, and the outcome of the consultation exercise, BEIS will re-designate the TMAD on 12 October 2021 or as soon as reasonably practicable within one month.

Where changes to the DCC Systems are required for the iGT certificate check, DCC has discussed the re-designation of the TMAD with BEIS and it is proposed that, subject to timely receipt of DCC's report, copies of relevant stakeholder responses to this consultation, and the outcome of the consultation exercise, BEIS will re-designate the TMAD on 12 October 2021 or as soon as reasonably practicable within one month.

In order to expedite the re-designation of the TMAD and, SMETS1 SVTAD (where no changes to the DCC Systems are required), DCC is also seeking views on behalf of BEIS on the proposed date for re-designation of the TMAD and SMETS1 SVTAD as well as the draft direction which is presented in Attachment 1 of this consultation document for stakeholder consideration.

DCC envisages that the TMAD may be re-designated with other unrelated SMETS1 changes prior to these re-designations. On this basis, DCC will transpose the changes in the scope of this consultation onto the updated TMAD.

It is important to note that should readiness to deliver some of these changes slip such that some changes can be deployed at different times to others (e.g. in the circumstances that there are elements of slippage on some but not all matters covered by this consultation), then rather than hold up deployment of all changes until the later of them are ready and thus delay the benefits of them, DCC may propose to BEIS instead that various documents are changed at different times to each other such that individual changes set out in this consultation document are capable of going live at separate times. In such circumstances it is proposed that BEIS could re-designate different changes to the documents so long as such designations occur within the one-month period. Should any changes need to occur outside this window, then a separate consultation on the designation date(s) would be required.

Unblocking 1 Q4

Do you agree with the proposed re-designation date of 29 July 2021 for updates to the TMAD and SMETS1 SVTAD related to unblocking Migrations where no changes to the DCC Systems are required?

Unblocking 1 Q5

Do you agree with the proposed re-designation date of 12 October 2021 for updates to the TMAD related to unblocking Migrations for extending the GT01 check to 72 hours and adjusting the iGT certificate check?

5. How to Respond

Please provide responses in the attached template by 1600 on 15 July 2021 to DCC at consultations@smartdcc.co.uk. This template may be submitted in PDF or similar format rather than Microsoft Word format if preferred.

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, please contact DCC via consultations@smartdcc.co.uk.

6. Attachments

Attachment	Title
1	Draft Notification Text on TMAD
2	Response Template
3	TMAD v13.X Draft red-lined
4	SMETS1 SVTAD v6.X Draft red-lined

Table 1 – Attachments

Attachment 1

This attachment contains the text that BEIS plans to use for direction of changes to the TMAD, and SMETS1 SVTAD.

Draft Direction Text (TMAD and SMETS1 SVTAD)

This direction is made for the purposes of the smart meter communications 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 [DD MM YYYY], the SMETS1 Transition and Migration Approach Document (TMAD) previously designated and incorporated into the SEC as Appendix AL, and the SEC Variation Testing Approach Document for SMETS1 Services previously designated and incorporated into the SEC as Appendix AK, 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 and the SEC Variation Testing Approach Document for SMETS1 Services shall be without prejudice to anything done under the DCC Licence or the SEC on or after this document first being designated, or the continuing effectiveness of anything done in 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.