



SMETS1 Consultation - Unblocking Migrations 2

**A SMETS1 consultation on a proposal by DCC to amend
the Migration Error Handling and Retry Strategy (MEHRS)
to allow migration of certain categories of SMETS1
Installations**

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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 TMAD is Appendix AL of the Smart Energy Code¹ (SEC) and the latest version (AL 15.0) was included in v42.0 of the SEC on 20 July 2021.

Clauses 8.8 to 8.10A of the TMAD covers the arrangements for initial development and subsequent change of the Migration Error Handling and Retry Strategy (MEHRS). The latest version of the MEHRS² (v5.0) was published on 8 April 2021 following a consultation with Industry.

In December 2020, the Department for Business Energy and Industrial Strategy (BEIS) consulted³ 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 concluded⁴ 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 focused on proposing changes to the MEHRS to allow certain categories of SMETS1 Installation to be unblocked and thus successfully 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 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 https://www.smartdcc.co.uk/media/1531/migration_error_handling_and_retry_strategy_v50.pdf

³ 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/>

⁴ 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 an amendment to the Code 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 second such consultation. This consultation is not proposing an amendment to the Code, rather a change to the MEHRS that will allow a certain category of SMETS1 Installations to be unblocked and thus capable of migration following the appropriate regulatory change process for the MEHRS (and DCC solution update).

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. Removing check MA516 and MA517 from the MEHRS – solution change required

This section sets out where DCC considers that the SMETS1 Installations can be included for migration following changes to the MEHRS. Stakeholder views are sought on this change. It should be noted that changes to the DCC Systems are required.

Within Table 1 of the MEHRS there are two checks (MA516 and MA517) that check whether a prepayment card attached to the ESME / GSME belongs to another energy supplier, who is not the Responsible Supplier. These checks are only applicable to the MOC (Secure) cohort. Although not mandated in the TMAD, at the time of initial development, these checks were implemented (by the relevant SMETS1 SMSO) due to a misinterpretation of the requirements. However, these checks are causing migration failures and the Responsible Supplier does not have the ability to correct this data to allow the migration to succeed at a later date. Also, this historic prepayment card data is cleared by the migration process and is therefore irrelevant to the operation of the device. At present, DCC estimates that approximately 75,000 SMETS1 Installations are blocked by this issue.

This change to remove the MA516 and MA517 checks requires a solution change which will be implemented following internal testing. This change does not require testing as a SMETS1 Uplift as there are no associated amendments to the Code as per the rules set out in Clause 21 of the

SMETS1 SVTAD. DCC expects to report to TAG on the outcome of the internal testing prior to deployment.

As this is a very minor change, DCC is planning for this to be deployed on 14 September 2021 as part of a maintenance release.

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Do you agree with DCC's proposal to amend the MEHRS to remove the MA516 and MA517 checks to unblock migration for impacted SMETS1 Installations? 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 publish an updated draft MEHRS consistent with the TMAD requirements.

DCC is aiming to conclude on this consultation no later than 27 August 2021. Consistent with the regulatory requirements, DCC plans to:

- publish a report covering DCC's conclusions on the MEHRS; and
- publish the draft MEHRS with an effective date of 14 September 2021 consistent with the requirements for a 14 day appeal window set out in Clause 8.9 of the TMAD.

5. How to Respond

Please provide responses in the attached template by 1600 on 20 August 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	Response Template
2	Draft MEHRS v5.1 red-lined against v5.0

Table 1 – Attachments