

SMETS1 Conclusions Unblocking Migrations 1

A SMETS1 conclusion 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)

Filename: CON_SMETS1_Unblocking1_Conclusion

Date: 4 August 2021

Author: consultations@smartdcc.co.uk

Classification: DCC Public

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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 21 July 2021 as v42.0.

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 which provide a transparent process for promptly assessing SMETS1 Installations currently blocked for Migration.

On 24 June 2021, DCC consulted⁴ on regulatory changes that will enable certain categories of currently blocked SMETS1 Installation to be Migrated. This document provides a response to that consultation consistent with the regulatory requirements for amending the TMAD and SMETS1 SVTAD.

2. Stakeholder Engagement

This section details DCC's stakeholder engagement that has taken place in relation to the proposed regulatory changes.

2.1. Questions

Table 1 below details the questions related to the proposed unblocking changes that were presented in the public consultation.

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/>

⁴ <https://www.smartdcc.co.uk/customer-engagement/smets1-consultation-unblocking-1/>

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.
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.
Unblocking 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.
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?

Table 1 – Consultation Questions

2.2. Responses

Stakeholders were invited to respond to the consultation issued on 24 June 2021 by 16:00 on Thursday 15 July 2021 using the response template⁵ that was provided.

DCC received a written response from five respondents regarding this consultation.

Additionally, DCC had separate calls with two respondents to explore concerns raised as part of each of their responses; further details are provided below.

3. 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 reply including a statement on any areas of disagreement.

3.1. SMETS1 PPMID Definition Change (Unblocking 1 Q1)

DCC sought views on proposals to vary the definition of a SMETS1 PPMID asking: "***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.***".

⁵ https://www.smartdcc.co.uk/media/6330/smets1_unblocking1_response_template.docx

3.1.1. Respondents Comments

All five respondents provided a supportive response to this question regarding the SMETS1 PPMID definition change.

Two respondents indicated that technical changes will be required for FOC (i.e. where GroupID is either EA or EB) to ensure the schema is populated correctly (IHD vs PPMID). Whilst the systems for other cohorts are already able correctly populate the schema for IHDs, DCC can confirm that this isn't currently possible for FOC and DCC is now progressing these technical changes. DCC expects these changes will be implemented on 7 December 2021 following appropriate testing. DCC also notes that this will require two version of the TMAD drafting; an initial version which excludes FOC with a subsequent version for all cohorts. One of these respondents also asked for further details to confirm how many of their SMETS1 installations would be affected where they are the Responsible Supplier. DCC has engaged directly with the Respondent regarding their query.

When indicating support for the proposal, another respondent stated that they have a significant quantity of SMETS1 meters which are blocked from migration due to this issue.

One respondent noted that any unsupported IHD may need to be replaced which would lead to additional costs for the Responsible Supplier related to device replacement. DCC agrees that this is a potential risk but notes that the alternative approach is to not pursue this change and thus exclude all such SMETS1 Installations from the scope of migration which would mean that a site visit / replacement devices are required in all circumstances. DCC has discussed this response with the respondent. The respondent accepted DCC's explanation of the situation. The respondent confirmed to DCC that they considered the proposal was acceptable.

3.1.2. Areas of Disagreement

There were no areas of disagreement with the changes proposed to the TMAD and SMETS1 SVTAD related to the change in SMETS1 PPMID definition.

3.2. Increasing GSME check period for GT01 for IOC & MOC (MDS) (Unblocking 1 Q2)

DCC sought views on proposals to extend the GT01 check time to 72 hours asking: "***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.***".

3.2.1. Respondents Comments

Three respondents provided a supportive response to this question without further details.

Two respondents disagreed with DCC's proposal related to extending the GT01 check to 72 hours.

One respondent (that disagreed) expressed concern that the proposal to extend the GT01 check time from 24 hours to 72 hours may give rise to problematic smart services related to the GSME. This respondent was concerned that the underlying root cause for intermittent communication with the GSME within IOC and MOC (MDS) was not set out. This respondent asked DCC for further insight into these communication issues so they could understand

the extent to which there are implied deficiencies in smart metering systems operation where the 72 hour GT01 check is successful but a 24 hour GT01 check is unsuccessful. DCC has discussed this response with the respondent. DCC explained that real life experience from other energy suppliers is that in many cases there is intermittent communication with the gas meter. DCC also noted that this proposal was discussed at the TBDG E&A Sub-group and that other energy suppliers considered this proposal to be acceptable at that forum. The respondent accepted DCC's explanation of the situation. The respondent confirmed to DCC that they considered the proposal was acceptable.

The other respondent, that disagreed with DCC's proposal related to extending the GT01 check to 72 hours, expressed concern that any sporadic connection issues related to the GSME are likely to continue following migration of the SMETS1 Installation. This respondent indicated there is a risk that the meter set in such SMETS1 Installations may need to be replaced which may lead to additional costs for the Responsible Supplier related to a further site visit to replace with a fully functioning meter set (ESME & GSME). DCC has discussed this response with the respondent. DCC explained that real life experience from other energy suppliers is that in many cases there is intermittent communication with the gas meter. DCC also highlighted that the alternative approach is to exclude such the SMETS1 Installation from the scope of migration which would mean that a site visit is required in all circumstances. The respondent accepted DCC's explanation of the situation. The respondent confirmed that they considered the proposal was acceptable given that is expected to only unblock 5,000 SMETS1 Installations.

3.2.2. Areas of Disagreement

There were no outstanding areas of disagreement with the changes proposed for the GT01 check.

3.3. Removing migration check for iGT issue (Unblocking 1 Q3)

DCC sought views on proposals to remove the certificate check for iGTs asking: ***"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."***

3.3.1. Respondents Comments

All five respondents provided a supportive response to this question regarding the removal of the certificate check for iGTs without further comment.

3.3.2. Areas of Disagreement

There were no areas of disagreement with the changes proposed related to the iGT checks.

3.4. Proposed Re-designation Date – no change to DCC Systems (Unblocking 1 Q4)

DCC sought views on proposals to dates to re-designate changes the TMAD and SMETS1 SVTAD for the SMETS1 PPMID definition change where changes to DCC Systems were not required asking: ***"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?"***

3.4.1. Respondents Comments

Four respondents provided a supportive response to this question regarding the date for SMETS1 PPMID definition change to be re-designated.

The fifth respondent indicated that that this change to the SMETS1 PPMID definition will require testing for FOC. DCC accepts this point and plans to progress appropriate testing pursuant to the SMETS1 SVTAD. DCC will consult on a re-designation date (expected to be 7 December 2021) to apply this change to FOC in due course.

3.4.2. Areas of Disagreement

There were no areas of disagreement with re-designation date for the TMAD and SMETS1 SVTAD related to the SMETS1 PPMID definition.

3.5. Proposed Re-designation Date –change to DCC Systems required (Unblocking 1 Q5)

DCC sought views on proposals to dates to re-designate changes the TMAD (extending the GT01 check time to 72 hours and removing the certificate check for iGTs) where changes to DCC Systems were required asking: ***“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?”***.

3.5.1. Respondents Comments

All five respondents provided a supportive response to this question.

Two respondents expressed a desire for these changes to be implemented earlier. One of these respondents indicated that this timeline would extend their plans for migration of SMETS1 Installations containing Active Meters. The other respondent stressed the importance of such unblocking changes to be progressed promptly to avoid the risk of SMETS1 devices being stranded once the SMETS1 SMSO ceases to provide a service. DCC notes these concerns related to the timeline for such changes to be progressed. Given the consultation schedule, it was not possible for these changes to be implemented in the August maintenance release and so it was scheduled for the October maintenance release.

One respondent provided a supportive but caveated response to this question. The respondent supported the re-designation date regarding the removal of the certificate check for iGTs. However, this respondent provided caveated support for the re-designation date related to extending the GT01 check to 72 hours, consistent with their concerns related to the GT01 changes set out in response to Q2 (which have now been addressed).

3.5.2. Areas of Disagreement

There were no areas of outstanding disagreement with the re-designation date for the GT01 iGT checks.

4. Summary of Drafting Changes

There are no material drafting changes resulting from consultation feedback.

However, the amendment to the SMETS1 PPMID definition requires a change to the S1SP solution where GroupID is equal to "EA" or "EB" which requires testing as a SMETS1 Uplift (as set out above in Sub-Section 3.1.1). Given this testing requirement, DCC will propose to BEIS to re-designate a version of the TMAD where the definition change applies to all GroupIDs except "EA" and "EB" and retains the existing definition where GroupID is equal to "EA" or "EB". There is also a minor consequential change to the SMETS1 SVTAD. The conclusion versions of the SMETS1 SVTAD and TMAD for re-designation on 29 July 2021 have been amended to reflect this distinction. DCC will consult on a date to re-designate the remaining element of the TMAD change to expand the definition to include where GroupID is equal to "EA" and "EB" in due course. Subject to the implementation schedule being confirmed, DCC expects this date to be 7 December 2021.

The TMAD version used for the consultation was based on v13. However there have been changes to the TMAD; the latest version was published as v15.0 on 21 July 2021. Thus, the changes proposed within this conclusion are presented as v16.0 draft as a delta version against the latest v15.

Given the differing dates for implementation, DCC has provided the an annotated red-lined version of the TMAD showing when each change is expected to be re-designated.

5. Conclusions

DCC is confident that the versions of the TMAD and SMETS1 SVTAD 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 and SMETS1 SVTAD.

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 SMETS1 SVTAD and as such further consultation is neither necessary nor appropriate.

It is DCC's view that it has met its SEC obligations.

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

DCC considers that:

- the revised TMAD and SMETS1 SVTAD are defined to a sufficient level of detail for re-designation into the SEC;
- the revised and SMETS1 SVTAD 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 TMAD and SMETS1 SVTAD are materially complete, and the content is technically accurate.

In summary, DCC considers that the revised TMAD and SMETS1 SVTAD are fit for purpose.

6. 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 re-designate the revised TMAD and SMETS1 SVTAD into the regulatory framework for these unblocking changes.

Given this consultation process DCC notes the latest date that the changes to amend the SMETS1 PPMID definition (excluding where GroupID is equal to "EA" or "EB") is 29 August 2021 without requiring a further consultation on the designation date.

Given this consultation process DCC notes the earliest date that the changes to extend the GT01 check to 72 hours and adjust the iGT certificate check could be re-designated is 12 October 2021 and the latest date is 12 November 2021 without requiring a further consultation on the designation date.

DCC will consult separately on a date to amend the TMAD for the SMETS1 PPMID definition (to remove the distinction where GroupID is "EA" or "EB") in due course once the 7 December 2021 timeline is confirmed.

7. Attachments

Attachment	Title
1.	TMAD v16.0 draft delta against current version v15.0
2.	TMAD v16.0 draft clean (29 July 2021 re-designation version)
3.	TMAD v16.0 draft clean (12 October 2021 re-designation version)
4.	TMAD v16.0 draft clean (7 December 2021 re-designation version)
5.	SMETS1 SVTAD v7.0 delta against current version v6.0
6.	SMETS1 SVTAD v7.0 draft clean (29 July 2021 re-designation version)

Table 2 - Attachments