



DCC Conclusions on changes to the SMETS 1 Supporting Requirements (S1SR) and further consultation on the S1SR to support Uplift 2.2 for the FOC Cohort

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## 1. Introduction and Context

In the initial stages of the smart meter roll-out across Great Britain, a number of energy suppliers installed first generation smart metering devices (known as SMETS1 devices), in households and small/medium non domestic premises. SMETS1 devices installed by one energy supplier, however, are not always interoperable with and supported by the systems used by another supplier. The Data Communications Company (DCC) has developed a plan and designed a solution for the incorporation of such devices into its national network. It provides important shared benefits for industry and consumers and intends to offer the ability for SMETS1 consumers to maintain their smart services following a decision to switch suppliers.

The DCC solution relies on a common DCC User interface, defined in the DCC User Interface Specification (DUIS) for users of both SMETS1 and SMETS2+ devices. The SMETS1 Supporting Requirements (S1SR) – Appendix AM of the Smart Energy Code (SEC) - describes supplementary rules for how DCC will process SMETS1 Service Requests / Service Reference Variants (SRs/SRVs) and includes the accommodation of behaviours that are specific to particular SMETS1 Device Models.

On 27 July 2021, DCC consulted on changes to the S1SR to make provision for device specific behaviours in relation to Uplift 2.2 of the FOC cohort, which consultation closed on 20 August 2021. This document considers the responses that were received to this consultation consistent with regulatory requirements.

DCC has identified further FOC device specific behaviours that requires consultation with Industry, further details of these changes are set out in Section 4 below. DCC is consulting for a period of two weeks to ensure that these device specific behaviours can be designated in parallel with the Uplift 2.2 go-live as DCC is of the view that it would be in the interests of Industry to understand these behaviours as soon as possible.

# 2. Consultation Questions & Responses

### 2.1. Questions

The consultation presented the consultation questions as set out in Table 1.

S1SR Q1	Do you agree with the proposed amendments to the SMETS1 Supporting Requirements Document (S1SR) in Section 18 of that document, that have been added to describe the device behaviour specific relevant to the FOC devices?
S1SR Q2	Do you agree with mappings of clauses in Section 18 of S1SR to the relevant Device Models in DMVES?
S1SR Q3	Do you have any comments on the draft direction included in Attachment 1 or on the proposed date of 14 September 2021 or as soon as reasonably practicable within 1 month thereafter for redesignation of the S1SR?

Table 1

## 2.2. Responses

DCC received a written response from three respondents to the consultation on the S1SR.

DCC provided all written responses to the Secretary of State.

# 3. Analysis of Responses

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

DCC has structured the analysis of responses by question. Thus, this section presents DCC's analysis by question in several separate subsections; with each structured as:

- an overview of the responses on the topic;
- where appropriate a DCC response; and
- areas where DCC disagrees with the view presented by respondents, as the regulation requirements require DCC to report on this.

### 3.1. S1SR Question 1

DCC was seeking views on changes relating to the following:

- Removal of Device Specific Behaviours regarding Scalar behaviours have been removed that were introduced as part of FOC Uplift 2.0
- Addition of one device behaviour regarding extra entries in responses
- Addition of one device behaviour when setting the billing calendar

DCC sought views on proposals to amend the S1SR for FOC asking "Do you agree with the proposed amendments to the SMETS1 Supporting Requirements Document (S1SR) in Section 18 of that document, that have been added to describe the device behaviour specific relevant to the FOC devices?".

#### Respondent View

DCC received three responses to this question.

All respondents were supportive of the proposed changes. However, one respondent considered that the proposed change to 18.1(y) relating to Scalar behaviours should not be removed as there are additional devices that are still subject to this device specific behaviour.

#### DCC Response

DCC acknowledges that there are other devices, in other cohorts, that exhibit similar behaviour. DCC is investigating a solution for these other devices and will bring forward any proposals for resolution once these investigations are complete.

### **3.2. S1SR Question 2**

DCC sought views on proposals to amend the DMVES asking: "Do you agree with the mapping of clauses in Section 18 of S1SR to the relevant Device Models in DMVES?".

#### Respondent View

All respondents agreed with the mapping.

### 3.3. S1SR Question 3

DCC sought views on proposals to re-designate the S1SR asking: "Do you have any comments on the draft direction included in Attachment 1 or on the proposed date of 14 September 2021 or as soon as reasonably practicable within 1 month thereafter for redesignation of the S1SR".

#### Respondent View

Two respondents agreed with this date. The third respondent accepted this date.

In its consultation, DCC was targeting designation of these documents on the 14 September 2021. Since publication of consultation, DCC has established that it will not be able to meet this date and will instead be in a position meet its regulatory obligations for Uplift 2.2 on 12 October 2021. DCC is therefore intending to submit to the Secretary of State the S1SR for designation into the SEC on 05 October 2021 and anticipates that BEIS will designate on 12 October 2021.

## 4. Further Consultation

DCC has identified additional device specific behaviours that need to be addressed and DCC is of the view that it would be helpful for Industry to understand these behaviours as soon as possible and therefore intends to have these behaviours designated into the SEC alongside Uplift 2.2. This section sets out these behaviours and seeks views from industry on the proposed changes.

### 4.1. Restrict Access for Change of Tenancy (SRV3.2)

Some FOC PPMID devices do not respond to the ZigBee Change of Tenancy command when it is published on the HAN, as a result of the SRV being sent to the device. DCC investigated a number of options to protect the previous consumers data from the new consumer (in line with GDPR requirements) and the only viable solution is that the profile data must be deleted from the ESME. Considering this, users should make sure that if access is needed to historic profile data then this will need to be collected from the device if it has not been stored by the S1SP (see Section 4.3 below) and before enacting the Restrict Access for Change of Tenancy command.

To make provision for this behaviour, a new subsection (e) has been added.

(e) Where the provisions of clause 18.9(d) apply, the target SMETS1 ESME will also delete the data from the ProfileDataLog (with its SMETS1 meaning) on the device from the start of the first data item in the log to the date and time that the restriction is applied.

#### 4.2. Block Tariff's

Affects the following SRV's:

Read Instantaneous Import TOU With Blocks Matrices (SRV 4.1.3)

Retrieve Change Of Mode / Tariff Triggered Billing Data Log (SRV 4.4.2)

Retrieve Billing Calendar Triggered Billing Data Log (SRV 4.4.3)

Retrieve Import Daily Read Log (SRV 4.6.1)

The L+G ESME is currently configured so that the block counters increment continuously and do not reset at the end of every billing period, effectively ignoring the Billing Calendar.

This is a configurable item, so could be reconfigured however this will introduce time and cost to the programme to design, build and test the required functionality. Reconfiguration would also mean that all historic information would be lost from the device when we have migrated approx. ½ million devices already.

Suppliers will need to ensure that they are accounting for this within their billing systems if they want to utilise a block tariff with an L+G ESME. E.g.

To make provision for this behaviour, a new clause has been added to Section 18.17:

(j) Where the target SMETS1 ESME does not reset block counters in accordance with the Billing Calendar timetable, the SMETS1 Response will contain Block Counters (with their SMETS1 meanings) that are always increasing in value and are never reset.

## 4.3. Retrieve Active Import Profile Data (SRV 4.8.1)

FOC Uplift 2.2 introduces optimisations for access to profile data. Where the user has setup a schedule for its retrieval, the meter will push this data to the S1SP daily, where it will be stored. This will mean that most requests for profile data should be able to be satisfied without sending a

request to the meter. For electricity, this will also mean that when the data is deleted from the ESME on a Change of Tenancy, if a schedule exists, this data may be retrievable from the S1SP database. For Gas, any requests for data that are greater than 1 day, will be wholly satisfied from the database, and therefore because the daily push happens at midnight local time, the last entry returned would reflect this.

To make provision for this behaviour, two new clauses have been added to Section 18.22:

- (e) Pursuant to clause **Error! Reference source not found.**, where the target SMETS1 ESME, has deleted the data from the device, the only LogEntries (with its MMC meaning) returned in the SMETS1 Response will be those after the restriction has been applied unless there has been an active DSP Schedule for this service request that covers part of the ReadLogPeriod (with its DUIS meaning), in which case this data may be returned.
- (f) Where the target SMETS1 GSME does not support the reading of more than 24 hours' worth of data, then the S1SP shall, where the ReadLogPeriod (with its DUIS meaning) is greater than 24 hours, return a SMETS1 Response with LogEntrys (with its MMC meaning) which only include Timestamps (with its MMC meaning) where an active DSP Schedule exists and the last LogEntry (with its MMC meaning) will, in the period of British Summer Time have a Timestamp (with its MMC meaning) of 23:00:00 on the day before the EndDateTime (with its DUIS meaning) and 00:00:00 on the EndDateTime, otherwise.

There are also consequential changes to the DMVES document and to 18.23, and 18.24 to provide that 18.22(e) applies to these sections.

DCC intends to designate these changes in line with the date consulted on in the previous consultation.

S1SF	R Q1	Do you agree with the proposed amendments to the SMETS1 Supporting Requirements Document (S1SR) in Section 18 of that document, that have been added to describe the device behaviour specific relevant to the FOC devices?
S1SF	R Q2	Do you agree with mappings of clauses in Section 18 of S1SR to the relevant Device Models in DMVES?

## 5. Next Steps

DCC will submit its conclusions for the two consultations on regulatory changes to support Uplift 2.2 for FOC as well as the addition changes proposed in this consultation. DCC will provide an updated version of S1SR to the Secretary of State on 05 October 2021 that contains all of the proposed changes in both of these consultations and anticipates that the Secretary of State will re-designate the S1SR on 12 October 2021.

# 6. How to Respond

Please provide responses by 1600 on 28 September 2021 to DCC at consultations@smartdcc.co.uk.

Consultation responses may be published on our website <a href="www.smartdcc.co.uk">www.smartdcc.co.uk</a>. 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 of 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 documents, please contact DCC via consultations@smartdcc.co.uk.

## 7. Attachments

- Attachment 1: SEC Appendix AM SMETS1 Supporting Requirement clean
- Attachment 2: SEC Appendix AM SMETS1 Supporting Requirement redlined
- Attachment 3: SEC Appendix AM Annex A Device Model Variations to Equivalent Steps
- Attachment 4: S1SR Response Template