

## SMETS1 Consultation - Various 1

A SMETS1 consultation on a proposal by DCC to exclude / unblock certain categories of SMETS1 Installations from Migration, extend the Expiry Date for the TMAD, and propose that specified DMCs are not economic to test under the DMCT Process in the SMETS1 SVTAD.

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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 Code<sup>1</sup> (SEC). 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 SEC. The latest version of the SEC was published on 8 October 2021 as v48.0.

This consultation covers various changes to the TMAD and SMETS1 SVTAD.

In February 2021, following consultation, BEIS introduced<sup>2</sup> Clauses 1.4 to 1.9 in the TMAD. Prior to the changes, the regulatory framework provided DCC with an obligation to take all reasonable steps to progress migrations as quickly as possible but did not cater for scenarios, for example, where all reasonable attempts at retry have been exhausted but they remain blocked, or where data quality issues are preventing migrations being attempted. BEIS recognised that there will be scenarios where DCC and industry both consider that on balance a solution enabling migration is not practicable or proportionate, whether on technical, operational or economic grounds, and the new TMAD amendments provide a framework by which DCC can propose to formally exclude those DMCs from the scope of SMETS1 meter cohorts for which BEIS has previously determined that DCC should provide a SMETS1 service.

The elements introduced into the TMAD in February 2021 provide a framework for:

- i) the unblocking of SMETS1 installations presently eligible for migration (by virtue of having corresponding EPCL entries) but that cannot currently be successfully migrated; and
- ii) the exclusion of certain SMETS1 Installations that are currently in scope for enrolment (and which may or may not have a corresponding EPCL entry).

Under the Standard Licence Conditions<sup>3</sup> for gas supply and electricity supply, any SMETS1 meters that are not enrolled in DCC must be replaced with a SMETS2+ meter. BEIS have set this date<sup>4</sup> to be 31 December 2022.

The DMCT Process (set out within Clause 20 of the SMETS1 SVTAD) provides for a regime to allow assessment of SMETS1 DMCs (either via testing or on the basis that they are substantively equivalent to other tested DMCs/ECPL entries), to confirm whether they are suitable for the corresponding entries to be proposed for entry to the EPCL. Within the DMCT Process, there is the option for DCC to propose it is uneconomic to test certain DMCs, noting that, in these circumstances, substantive equivalency has also been discounted as a way forward for these DMCs.

<sup>1</sup> The current version of the SEC is available from <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>

<sup>2</sup> 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/>

<sup>3</sup> <https://www.ofgem.gov.uk/energy-policy-and-regulation/industry-licensing/licences-and-licence-conditions>

<sup>4</sup> <https://smartenergycodecompany.co.uk/latest-news/for-information-smart-metering-implementation-programme-direction-to-extend-the-smets1-replacement-obligations-to-31-december-2022/>

This consultation proposes that:

- a) certain categories of SMETS1 Installation which have corresponding entries on the EPCL are excluded from the scope of Migration and are thus no longer eligible for migration (pursuant to Clause 1.4 to 1.9 of the TMAD), and
- b) certain DMCs (within the IOC and FOC cohorts) are uneconomic to test within the context of the DMCT Process (pursuant to Clause 20.7 of the SMETS1 SVTAD).

In total, the various matters proposed in this consultation cover exclusion of approximately 25,000 SMETS1 Installations. Additionally, there is a proposal for 33,000 SMETS1 Installations to be partially unblocked / excluded i.e. each electricity meter within the SMETS1 Installation is unblocked and thus migrated whilst the corresponding gas meter is excluded.

BEIS has instructed DCC to amend the approach (set out in the TMAD) where DCC considers that categories of Smart Metering Systems (SMS) or Installations should be excluded from migration. Per the existing Clause 1.7 of the TMAD, the current approach to exclusions is based on the Secretary of State confirming that they do not disagree with DCC's conclusion report (prepared following the process described in Clause 1.6 of the TMAD) and then DCC no longer considering the impacted SMETS1 Installations to be eligible for SMETS1 services. The proposed amendments will instead separately capture each exclusion category as a specific TMAD change (via a new Clause 18 detailing each exclusion category). DCC retains obligations to advise impacted SEC parties on how the decisions impact them, where DCC reasonably knows this information. These proposals are covered in Section 3 of this consultation document.

This consultation also provides an update to the SMETS1 PPMID definition change for FOC (to classify PPMIDs as IHDs in certain circumstances). This matter was deferred (in the Unblocking 1 Conclusion<sup>5</sup>) to a later date that was expected at that time to be 7 December 2021.

Additionally, this consultation proposes to extend the existing expiry date in Clause 1.3 of the TMAD from 31 December 2021 to 31 December 2022.

Please note that DCC is also holding a stakeholder briefing on matters covered by this consultation on Wednesday 3 November 2021 between 1430 and 1530 via Microsoft Teams to enhance the effectiveness of the consultation. Please email [customerengagement@smartdcc.co.uk](mailto:customerengagement@smartdcc.co.uk) if you wish to be invited to this briefing.

## 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, around 3.7 million SMETS1 Installations have been Migrated, thereby facilitating interoperable smart services to these energy customers. Also, most SMETS1 Installations are aligned to an entry on the EPCL and thus eligible for migration with the remaining EPCL entries expected to be added by the end of the year.

DCC has identified certain categories where a small minority of SMETS1 Installations are 'blocked' for migration due to a range of reasons. This cuts across meters both on the EPCL as well as those that are not. At the start of 2021, BEIS introduced changes to Clause 1 of the TMAD to address such 'blocked' SMETS1 Installations. The existing Clause 1 of the TMAD provide two routes to address such blocked SMETS1 Installations:

<sup>5</sup> <https://www.smartdcc.co.uk/customer-engagement/skets1-conclusion-unblocking-1/>

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

Additionally, the existing Clauses 1.6 and 1.7 of the TMAD prescribe an approach for stakeholder consultation on any DCC proposals (Unblocking / Excluding) and subsequent provision of a conclusion report to the Secretary of State. There are also existing requirements in Clause 1.7 of the TMAD 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 (supported by energy suppliers / SMETS1 SMSOs where appropriate) has been able to take economically efficient steps to unblock these migrations without the need for a regulatory / solution change e.g. by correcting data errors between registration data in the SMETS1 SMSO and DCC (with support from the Responsible Supplier where required). DCC is continuing with such unblocking activities where available.

Across the summer of 2021, DCC has consulted twice on regulatory / solution changes to facilitate unblocking:

- Unblocking 1 Consultation<sup>6</sup> was concluded<sup>7</sup> on 4 August 2021; it covered changes to the definition of SMETS1 PPMID, increasing the GSME-HAN connectivity check period for IOC & MOC (MDS) from 24 hours to 72 hours (the 'GT01' check), and removal of the migration check on the certificate for iGT; and
- Unblocking 2 Consultation<sup>8</sup> was concluded<sup>9</sup> on 26 August 2021; it covered amending the Migration Error Handling and Retry Strategy (MEHRS) to remove two checks related to the prepayment card for the MOC (Secure) cohort.

This consultation focuses mainly on certain categories of SMETS1 Installations that are proposed to be excluded from the scope of Migration where DCC has not been able to find a viable migration solution. These exclusions cover circumstances where:

- the correct Master Key(s) are not available for IOC and MOC (MDS);
- WAN communication cannot be successfully established for a SMETS1 Installation before migration is attempted for IOC;
- WAN communication cannot be successfully established for a SMETS1 Installation during migration attempts for IOC and MOC (MDS);
- it is uneconomic to test the DMC via the DMCT Process (IOC and FOC); and
- there have been at least five unsuccessful migration attempts for IOC, MOC (MDS), and MOC (Secure).

<sup>6</sup> <https://www.smartdcc.co.uk/customer-engagement/smets1-consultation-unblocking-1/>

<sup>7</sup> <https://www.smartdcc.co.uk/customer-engagement/smets1-conclusion-unblocking-1/>

<sup>8</sup> <https://www.smartdcc.co.uk/customer-engagement/smets1-consultation-unblocking-2/>

<sup>9</sup> <https://www.smartdcc.co.uk/customer-engagement/smets1-conclusion-unblocking-2/>

There is also a proposal to migrate the electricity meter and exclude the gas meter within the same SMETS1 Installation in specified circumstances for IOC and MOC (Secure).

Additionally, this consultation includes a proposal related to the DMCT Process, where DCC considers that it is not economic to test a limited number of DMCs in the IOC and FOC cohorts. On the basis that the proposal not to test is considered acceptable, the impacted SMETS1 Installations would be excluded by the proposed TMAD drafting (as set out in the fourth bullet above).

DCC's investigation into blocked SMETS1 Installations is on-going. Further consultations are envisaged in the coming months 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 across all Cohorts.

### **3. Process Amendments to TMAD and Consequential change to SMETS1 SVTAD**

As set out earlier in this document, BEIS have requested that DCC consults on some amendments to the TMAD where DCC is considering categories of SMETS1 Smart Metering Systems or Installations that should be excluded from migration. Specifically, the proposal is that each excluded category shall be established via a Secretary of State redesignated amendment to the Code (specifically amendments to Clause 18 of the TMAD), rather than being determined solely via a decision by the Secretary of State not to object to DCC's recommendation (as currently prescribed in the existing Clause 1.7 of the TMAD which is proposed for deletion). Additionally, BEIS have requested that DCC consults on a requirement for DCC to inform any Responsible Supplier likely to be impacted on the extent to which they might be impacted by a particular category of proposed exclusion at the point at which DCC is ready to consult.

Accordingly, to support this, DCC has proposed the following additional amendments to the TMAD:

- amendments to Clause 1.5 to cater for either an entire SMETS1 Installation, or only a Smart Metering System within an Installation, to be the subject of an exclusion category;
- amendments to Clause 1.6 of the TMAD which include a requirement on DCC to consult with Energy Suppliers impacted by proposed exclusions at the point of consultation (to the extent DCC reasonably knows of the impact);
- deletion of Clause 1.7 (which previously captured the outcome of the consultation on exclusions), which is proposed for replacement with new provisions in Clause 18.3 along with a more general requirement for each exclusion category to be prescribed by the drafting in Clause 18;
- amendment of Clause 1.9 to align with the scope for the Secretary of State to direct DCC to take alternative action in Clause 18.5 (b);
- the introduction of a new Clause 18.1 which will provide that any exclusions drafted in Clause 18 takes precedence over any conflicting provisions elsewhere in the TMAD i.e. to remove any legal uncertainty between the migration rights and obligations in the existing TMAD provisions and the new exclusions in Clause 18;
- a new Clause 18.2 that specifies that for any categories of excluded Installations or Smart Metering Systems listed in Clause 18:
  - the relevant SMETS1 SMS(s) is no longer in scope of enrolment; and/or



- the relevant SMETS1 Installation(s) are excluded from the scope of Migration;
- DCC is no longer required to provide a SMETS1 Service for the SMETS1 SMS(s); and
- DCC is relieved from the obligation to Migrate Dormant Meters in Clause 4.24 of the TMAD;
- the introduction of new Clauses 18.4 to 18.9 which specifies the categories of exclusions and the consequences of them being excluded;
- Clause 3.15 (g) is amended to recognise that the definition of eligible for enrolment in H5.8 and associated provisions in H5.9 must now take into account any exclusions categories in Clause 18 of the TMAD;
- the term Excluded Category is added to the TMAD definitions in Clause 2 of the TMAD; and
- given that there is scope for customer switching, the amendments to the TMAD increase the reporting requirement, such that each month DCC will provide each Responsible Supplier with a list<sup>10</sup> of the Exclusion Category, MPAN and/or MPRN covering all meters excluded from Migration (irrespective of whether they are a Dormant Meter or an Active Meter) pursuant to the proposed new Clause 18.3 (which replaces the more limited one off reporting requirements for only Dormant Meters in the deleted Clause 1.7 of the TMAD).

DCC has also proposed a consequential amendment to the definition of 'In-Scope DMCs' (in the Table 1.1) for the DMCT Process and also a similar change included in Clauses 13.2 and 20.1 of the SMETS1 SVTAD to make it clear that any DMCs that are not yet represented on the EPCL and are the subject of an exclusions category in the TMAD no longer fall within the scope of the DMCT Process.

DCC intends to deliver the information described above (potential exclusions at the point of consultation and monthly updates its SMETS1 SMSs in each Excluded Category) electronically via DCC's SharePoint provided to each Responsible Supplier consistent with other migration related data exchange as per Clause 9 of the TMAD.

These proposed amendments seek to provide clarity to SEC Parties on the potential or actual impacts to them during any exclusions consultation process and following decisions to exclude. BEIS is asking DCC to consult on such amendments as a means of delivering an effective consultation process (including that industry understand the consequences of any exclusion decisions) given existing Supplier Licence Obligations (whereby any unenrolled SMETS1 SMS must be replaced with SMETS2+ by 31 December 2022).

There is also a single typographical amendment to correct a referencing error in Clause 5.10.

## Various 1 Q1

Do you have any comments on the proposed amendments to the process for exclusions and the associated amendments to Clauses 1.5, 1.6, 1.7, 1.9, 3.15 (g), 18.1, 18.2, and 18.3 of the TMAD and the consequential change to the SMETS1 SVTAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

<sup>10</sup> File name convention for this list in the DCC SharePoint will be: Exc\_<SEC PARTY ID>\_date\_time.csv.

The following sections, each set out a discrete category where DCC considers that a migration solution is not possible and thus an exclusion is consistent with the rationale set out in Clause 1.5 of the TMAD i.e. there are technical or operational barriers that make it impossible for Migration to be completed successfully or it is economically inefficient to take the necessary steps to facilitate Migration. Please note that the information reported below is based on available data at the time of publication and is subject to change e.g. impacted numbers of SMETS1 Installations will change where SMETS1 is replaced with SMETS2+. Stakeholder views are sought separately on each category of exclusion. Responsible Suppliers should also be aware that details on the extent of impact on their own portfolio will be provided to them by DCC via the existing DCC SharePoint used for the exchange of SMETS1 migration information at the time of publication of this document.

## 4. Proposed Exclusion Category - Cryptographic Master Keys

Master Keys	
Description	<p>The security key arrangements vary across device types for IOC and MOC (MDS).</p> <p>There are a number of different key types used in IOC and MOC (MDS) devices:</p> <ul style="list-style-type: none"> <li>▪ Master Key;</li> <li>▪ Authentication Key;</li> <li>▪ Encryption Key; and</li> <li>▪ Prepayment Key.</li> </ul> <p>These keys control what device functionality can be accessed when logging on to a device using a given key, with only a sub-set of functionality made available for each key type. The TMAD requires that the keys on devices are rotated during the migration process (to restrict access by the SMETS1 SMSO following Migration) and the Master Key must be used to perform this action. Where the Master Key is not known then it is not possible to fulfil this requirement and the SMETS1 Installation cannot be migrated. Across IOC and MOC (MDS), the number of Master Keys per SMETS1 Installation varies by device manufacturer as below:</p> <ul style="list-style-type: none"> <li>▪ Aclara: one key for all devices;</li> <li>▪ Itron: one key for the CHF/GPF and one for the ESME (but no key for the GSME); and</li> <li>▪ Elster: one key per device.</li> </ul> <p>The DCC has become aware that for a number of SMETS1 Installations the Master Keys for the CHF are not available meaning that affected SMETS1 Installations cannot be migrated as the CHF supports operation of both Gas and Electricity Smart Metering Systems i.e. the SMETS1 Installation cannot be migrated without the Master Key for the CHF irrespective of whether Master Keys for the ESME and/or GMSE are available.</p>
	<p>Exclusion Type</p> <p>Technical or operational barriers.</p>



<p><b>Number of SMETS1 Installations</b></p>	<p>For IOC, 1 SMETS1 Installation containing only Dormant Meters where neither the Installing Supplier nor MAP has been able to provide the correct Master Key for the CHF to the SMETS1 SMSO.</p> <p>For MOC (MDS), 12,071 SMETS1 Installations containing only Dormant Meters where neither the Installing Supplier nor MAP has been able to provide the correct Master Key for the CHF to the SMETS1 SMSO.</p>
<p><b>Rationale</b></p>	<p>An exercise took place to resolve the situation related to missing Master Keys, which involved cross-checking the data from manufacturers against the keys currently held in production by the SMETS1 SMSO. In some instances, updated keys were provided that allowed some Migrations to advance, but there are some SMETS1 Installations that still cannot be migrated because the Master Key is unavailable. The SMETS1 SMSOs and relevant Installing Suppliers have confirmed that there is no solution to these Master Key issues where the correct Master Key is unavailable, despite extensive efforts to determine a resolution.</p> <p>Without the correct Master Key for the CHF there is no way of successfully migrating a device and maintaining the existing security arrangements, and any attempted migrations will fail. Thus, DCC proposes that the impacted SMETS1 Installations shall be excluded based on non-availability of the Master Key for the CHF. This exclusion covers only Dormant Meters as in these instances DCC should be relieved of its obligation to continue to attempt to migrate these Installations as lack of the Master Key is an unsurmountable technical problem.</p> <p>In the case of Active Meters, the Responsible Supplier provides DCC with an authorisation for the Migration of the SMETS1 Installation and the associated data required to support it. If the Responsible Supplier authorised a Migration, the Migration would fail due to the absence of the correct Master Key for the CHF.</p> <p>There is a theoretical edge case for Aclara and Elster, whereby the Master Keys for CHF and ESME are available and only the Master Key for the GSME is missing. In this circumstance, it would be possible to migrate the SMETS1 Installation for just the ESME (i.e. excluding the GSME) but this approach would be subject to further TMAD changes and amendments to DCC's solution. However, DCC is not aware of any SMETS1 Installations this applies to as, in all cases, the Master Key for the CHF is unknown.</p>
<p><b>Estimated Cost (where economically inefficient)</b></p>	<p>N/A</p>
<p><b>Various 1 Q2</b></p>	<p>Do you agree with DCC's proposal to exclude solely Dormant SMETS1 Installations from the scope of Migration where DCC has taken all reasonable steps to obtain the Master Key for the CHF as captured by Clause 18.4 of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.</p>

## 5. Proposed Exclusion Category - No WAN Before Migration Attempted

No WAN Before Migration Attempted	
Description	<p>Clause 4.26 of the TMAD covers the steps DCC is required to take to make Dormant Devices ready for Migration via firmware upgrade and/or configuration. DCC only has data on attempted upgrades and/or re-configuration for Dormant Devices within SMETS1 Installations, as Active Devices fall outside the responsibility of DCC to make ready for Migration. For some devices, the process cannot be completed successfully as it isn't possible to establish the required wide area network (WAN) communications in order to prepare the devices for migration.</p>
Exclusion Type	Technical or operational barriers.
Number of SMETS1 Installations	For IOC only, at present DCC has approximately 11,523 SMETS1 Installation containing only Dormant Meters blocked for migration due to no WAN failures regarding firmware upgrade and/or configuration.
Rationale	<p>Within IOC, there is a robust process in place within the SMETS1 SMSO for this firmware upgrade / configuration process which includes reporting on outcomes to DCC via the MR07 report. For the dormant devices in IOC, DCC will send a single instruction to the SMETS1 SMSO, who will then make several attempts to ready the device for migration. DCC's single instruction will result in a range of activities to upgrade / configure over a period of 2 to 4 weeks.</p> <p>For the dormant devices in IOC, a single instruction from DCC to the SMETS1 SMSO related to firmware upgrade / configuration instigates a range of activity:</p> <ul style="list-style-type: none"> <li>the retry process makes 36 attempts to upgrade firmware over 6 days and this is repeated 3 times totalling 108 attempts;</li> <li>for configuration there are 23 attempts to reconfigure over 3 days which is also repeated 3 times totalling 69 attempts; and</li> <li>confirmation of success is sought from the devices but such confirmation may not be received, where the confirmation has timed out there are 10 attempts over 10 days which is repeated 3 times totally 30 attempts.</li> </ul> <p>Based on experience for IOC, DCC considers that three instructions to the SMETS1 SMSO to upgrade / re-configure that leads to a no WAN failure is sufficient to demonstrate that the SMETS1 Installation should be excluded from the scope of migration given the number of attempted retries within the SMETS1 SMSO for each instruction sent by DCC.</p> <p>For SMETS1 Installations containing one or more Active Meters, it is for the Responsible Supplier to engage with the SMETS1 SMSO and thus outside DCC's control.</p> <p>DCC has not encountered this issue for MOC (MDS) as the MAP undertakes this upgrade / configuration activity without DCC's involvement.</p>

No WAN Before Migration Attempted	
Estimated Cost (where economically inefficient)	N/A
Various 1 Q3	Do you agree with DCC's proposal to exclude SMETS1 Installations (for IOC only) from the scope of Migration where the steps in Clause 4.26 (to upgrade and/or reconfigure Dormant Meters and associated Devices) have failed at least three times due to no WAN as captured by Clause 18.7 of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

## 6. Proposed Exclusion Category - No WAN Attempting Migration

No WAN Attempting Migration	
Description	Clause 5.12 (c) of the TMAD requires the Requesting Party to check for communication to the WAN with the Communications Hub in the previous seven days. This assessment takes place once the SMETS1 Installation has been made ready for migration i.e. upgraded / configured as necessary. This WAN check is a validation that is titled MA112 (as per the MEHRS <sup>11</sup> ). For some SMETS1 Installations, the migration fails as there hasn't been WAN communications in the previous seven days as per the requirement in Clause 5.12 (c) of the TMAD.
Exclusion Type	Technical or operational barriers.
Number of SMETS1 Installations	For IOC and MOC (MDS), DCC has 470 SMETS1 Installations, containing Dormant Meters, where the MA112 WAN check error code is currently blocking migration.
Rationale	Based on data so far, DCC has observed this MA112 WAN check error code for 12,135 different CHF's where these have successfully migrated on a reattempt. DCC has 470 SMETS1 Installations where this failure is currently blocking migration. DCC does not consider it efficient to undertake further detailed analysis of these specific failures. Instead, based on wider evidence of successful retries, DCC notes that every successful migration is resolved by no more than three attempts i.e. where a MA112 (No WAN error) occurred, success was achieved by the third retry. On this basis, DCC proposes to exclude where the MA112 error is consistently reported on at least three separate attempts to migrate in different Migration Weeks i.e. showing persistent failure over time.

<sup>11</sup> At the time of publication the effective MEHRS is V6.0 - [https://www.smartdcc.co.uk/media/6454/con\\_smets1\\_migration\\_error\\_handling\\_and\\_retry\\_strategy\\_v60.pdf](https://www.smartdcc.co.uk/media/6454/con_smets1_migration_error_handling_and_retry_strategy_v60.pdf)

No WAN Attempting Migration	
Estimated Cost (where economically inefficient)	N/A

Various 1 Q4	Do you agree with DCC's proposal to exclude SMETS1 Installations from the scope of Migration where Migration has failed at least three times in separate weeks due to no WAN as captured by Clause 18.8 of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.
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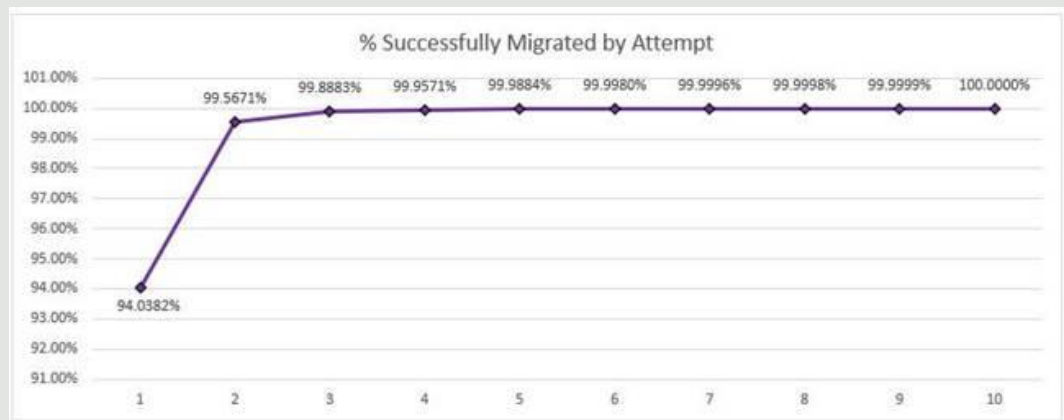
## 7. Proposed Exclusion Category - At Least Five Migration Attempts

Five Migration Attempts	
Description	The current Clause 4.24 of the TMAD requires DCC to continue to re-attempt Migration for SMETS1 Installations containing solely Dormant Meters. In some cases, DCC is able to amend data errors and successfully Migrate a SMETS1 Installation with a subsequent attempt. DCC observes that more than 5 attempted migrations provides no material improvement in outcome. There is an exemption for errors related to the checks prescribed in Table 5.10 of the TMAD. DCC considers that these Table 5.10 checks are related to administrative rather than technical issues and thus attempts to resolve these should continue to be made. Stakeholders should note that the TMAD drafting is based on 'at least' five times to prevent a loophole whereby if DCC made sixth attempt that was unsuccessful then the SMETS1 Installation would not be captured by this proposed exclusion.
Exclusion Type	Technical or operational barriers.
Number of SMETS1 Installations	For IOC, MOC (MDS), and MOC (Secure), DCC has 1,502 SMETS1 Installations where migration has been unsuccessful following at least five attempts.

## Five Migration Attempts

### Rationale

The Migration regime can give rise to roughly 400 distinct error codes given the sub-step reporting for failure outcomes. DCC does not consider it efficient to undertake never ending cycles of Migration retries as resources should be focused on Migration success. DCC notes that energy suppliers adopt varying approaches with some only making 3 attempts before replacing with SMETS2+ whereas others make up to 20 attempts. Also, DCC has no technical solution to resolve such errors. Instead, based on wider evidence of successful retries, DCC notes that every successful migration is generally resolved by no more than five separate attempts to migrate in different Migration Weeks i.e. showing persistent failure over time. The figure below shows that more than 5 attempts will yield very minor additional improvement in migration success. However, DCC may undertake further migration attempts where it considers these may be successful.



*NB the 100% success is rounded up on the chart as some migrations do remain unsuccessful*

For any mixed installation, DCC will continue to attempt Migration as this is aligned to the Responsible Supplier for the Active Meter.

### Estimated Cost (where economically inefficient)

N/A

### Various 1 Q5

Do you agree with DCC's proposal to exclude SMETS1 Installations from the scope of Migration where migration has failed at least five times in separate weeks as captured by Clause 18.9 of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

## 8. Proposal that Specified DMCs are Not Economic to Test under the DMCT Process and proposal that they should also be Excluded from Migration

Not Economic to Test	
<b>Description</b>	<p>Clause 20.7 of the SVTAD provides the right for DCC to propose to the Secretary of State that a specified DMC(s) is not economic to test under the DMCT Process. DCC considers it is uneconomic to undertake such testing on 6 DMCs. A decision not to test these DMCs prevents a corresponding 19 entries from being added to the EPCL. These 19 entries on the EPCL would cover 63 SMETS1 Installations. Subject to a decision that they are not economic to test, DCC is also proposing the 63 SMETS1 Installations should not be eligible for migration (including installations that are capable of being firmware upgraded to one of the 19 EPCL entries). Please note that the data reported below is based on available data at the time of publication.</p> <p>Details of the specific DMCs that would form the basis of 19 entries on the EPCL are presented in Attachment 2 of this consultation document for information.</p> <p>Also, DCC is proposing a generic exclusion within Clause 18 of the TMAD such that following a Secretary of State decision not to test via the DMCT Process the associated SMETS1 Installation are excluded without a further regulatory step.</p>
<b>Exclusion Type</b>	Economically inefficient
<b>Number of SMETS1 Installations</b>	63 SMETS1 Installations



## Not Economic to Test

### Rationale

In order to add these 19 entries to the EPCL, DCC would need to undertake testing via the DMCT Process on 6 DMCs. Testing these six Dormant DMC each gives rise to a single EPLC entry with an additional 13 entries on EPCL to be added based on substantive equivalence to the six tested DMCs. DCC has explored the scope for adding these 6 EPCL entries via the principle of substantive equivalence (to other EPCL entries) but this route has been discounted as DCC has not tested similar devices such that the approach captured in DCC's guidance note<sup>12</sup> on substantive equivalence can be applied.

DCC estimates that the full cost of progressing these 6 DMCs through the DMCT Process is approximately £670,000. This figure covers the testing costs with various service providers (e.g. DSP / SMETS1 SMSO / S1SP) as well as DCC's internal costs for a single tranche of testing under the DMCT Process for these 6 DMCs. The table below shows the estimated testing cost per DMC and per SMETS1 Installation. Given, the quantum of these costs and the number of Installations involved, DCC is minded to propose that, pursuant to Clause 20.7 of the SMETS1 SVTAD, it is uneconomic to progress such testing under the DMCT Process. Before DCC can formally make such proposals to the Secretary of State it is required to seek stakeholder views and this consultation constitutes such engagement with stakeholders.

Additionally, on the assumption that following consultation DCC proposes to the Secretary of State, and the Secretary of State accepts, that they are uneconomic to test, DCC would then seek to also exclude them from any further attempts to find a way of proposing entries corresponding to these DMCs for inclusion on the EPCL. For this purpose, DCC is also required to consult as per Clause 1.6 of the TMAD as DCC is proposing (via an amendment to Clause 18 of the TMAD) to exclude these SMETS1 Installations from the scope of Migration on the basis they are uneconomic to test and DCC has no other route within the existing regulatory framework to confirm:

- i) these 63 SMETS1 Installations are suitable for migration; and
- ii) the devices within these 63 SMETS1 Installation will interoperate successfully once migrated.

DCC has also considered the scope for adding these entries with some form of post-migration assessment on each of the 63 SMETS1 Installations to confirm the devices migrated successfully and interoperate without prior testing or some other assessment. Such an approach would involve a range of detailed regulatory changes. DCC and each impacted Responsible Supplier would need to develop some process changes e.g. in case the migrated devices needed an urgent replacement. There would also be operational analyst resource required from within DCC and each Responsible Supplier in order to provide suitable assurances regarding outcomes i.e. to review the outcomes from migration / an agreed pack of SRVs.

<sup>12</sup> <https://www.smartdcc.co.uk/document-centre/?search=guidance&filter=2081>

## Not Economic to Test

This table presents an estimate of the testing cost per SMETS1 Installation regarding the cost of the DMCT Process on the basis that the total cost is allocated equally per DMC (which means the cost per SMETS1 Installation is very high where there are few SMETS1 Installations against the DMC). DCC considers this to be an appropriate allocation of costs given the fixed cost nature of testing.

DMC	EPCL Entries	SMETS1 Installations that are eligible for migration based on testing the DMC	Estimated Testing Cost per DMC	Estimated Testing Cost per SMETS1 Installation
DMC 1	9	41	£111,700	£2,700
DMC 2	1	1	£111,700	£111,700
DMC 3	1	7	£111,700	£16,000
DMC 4	5	8	£111,700	£14,000
DMC 5	2	5	£111,700	£22,300
DMC 6	1	1	£111,700	£111,700

Estimated Cost (where economically inefficient)

DCC has also considered an alternative approach whereby these SMETS1 Installations could be Migrated without any prior assessment. Given that Migration of a SMETS1 Installation that has not been through any assurance process could give rise to a negative consumer impact e.g. preventing the on-going provision of smart services to these energy customers, DCC considers that detailed monitoring of device behaviour post-Migration by the Responsible Supplier and DCC is required for each of these 63 SMETS1 Installations. The Responsible Supplier would also need to take steps to be ready to instruct an urgent site visit for replacement with SMETS2+ meters. The current regulatory framework would need to be amended to allow for such an approach to be adopted. DCC considers this would be a material change in the arrangements / risk profile that should not be pursued.

The regulatory situation related to these 63 SMETS1 Installations requires two separate decisions:

- the decision not to test the relevant 6 DMCs within the DMCT Process, and
- a subsequent decision to exclude these 63 SMETS1 Installations from the scope of migration.

DCC is required to seek stakeholder views on the proposal not to test these 6 DMCs on the grounds that it is uneconomic as per Clause 20.7 of the SMETS1 SVTAD. Following this engagement, DCC is then required to make a recommendation to the Secretary of State who will make a final decision on whether testing under the DMCT Process should take place.

DCC is also proposing a generic exclusion category in Clause 18.5 of the TMAD. This would provide that, where each decision is made that a DMC is uneconomic to test (under Clause 20.7 of the SMETS1 SVTAD), then the DMC should also be excluded from the scope of DCC's SMETS1 enrolment activities. Thus, DCC would cease finding a way to add such a DMC to the EPCL and associated SMETS1 Installations would not be eligible for migration. This exclusion would not just apply to the 6 DMCs that are the subject of this consultation, but any future DMCs where a decision is taken that it is not economic to test under the DMCT Process. However, the TMAD drafting in Clause 18.4 contains a safeguard, whereby the Secretary of State may direct DCC to consider other routes for adding such DMCs to the EPCL, rather than excluding them from the scope of enrolment, if some alternative route was considered appropriate in the future.

DCC considered having two separate consultations<sup>13</sup> on these matters in succession. DCC considers the two-stage consultation approach to be inefficient as it is extremely unlikely that stakeholders would respond inconsistently to these related questions on whether it is economic to test and whether these DMCs should be excluded as uneconomic to test. Thus, on the grounds of efficiency, DCC is seeking views on both aspects in parallel.

#### Various 1 Q6

Do you agree with DCC's proposal that it is uneconomic to undertake the DMCT Process for the DMCs specified in Attachment 2 (of the consultation) consistent with Clause 20.7 of the SMETS1 SVTAD? Please provide a rationale for your views.

#### Various 1 Q7

Do you agree with DCC's proposal to exclude SMETS1 Installations where it is decided by the Secretary of State that it is uneconomic to undertake the DMCT Process, subject to the Secretary of State not directing otherwise, as captured by Clause 18.5 of the TMAD? Do you have any detailed comments on the relevant changes to the legal drafting? Please provide a rationale for your views.

## 9. Where GT01 persistently fails, enable Migration for the ESME but Exclusion for the GSME

Pursuant to Clause 1.4 and 1.5 of the TMAD, this section contains a discrete category where DCC proposes that the Electricity Smart Metering System within the SMETS1 Installation can be included for migration (but the Gas Smart Metering System excluded) i.e. a partial migration of the SMETS1 Installation. Please note that data reported below is based on available data at the time of publication.

As set out in the Unblocking 1 Consultation<sup>14</sup>, for the IOC, MOC (MDS), and MOC (Secure) cohorts, the main source of migration failures is related to a check on the extent of communication between the Communications Hub and the GSME. The Unblocking 1 Conclusion<sup>15</sup> set out that the check should be extended to confirm that the Communications Hub and the GSME have communicated in the last 72 hours (rather than the existing 24 hours) for IOC and MOC (MDS) to allow GSMEs with intermittent communications to be migrated. The Unblocking 1 Consultation explained that extending the time of the GT01 check to 72 hours was not proposed

<sup>13</sup> The two separate consultations would be:

1. An initial consultation process on the decision to test (under Clause 20.7 of the SMETS1 SVTAD) leading to a recommendation to the Secretary of State.
2. A further consultation on the exclusion aspect (under Clause 1.6 of the TMAD) also leading to a recommendation to the Secretary of State.

<sup>14</sup> <https://www.smartdccc.co.uk/customer-engagement/smets1-consultation-unblocking-1/>

<sup>15</sup> <https://www.smartdccc.co.uk/customer-engagement/smets1-conclusion-unblocking-1/>

for MOC (Secure) as the evidence available suggested it provided very limited improvement. The change in the GT01 check to 72 hours was scheduled to be implemented on 12 October 2021 but is now expected to be implemented from 4 November 2021.

As set out in the Unblocking 1 consultation, amending the GT01 check to 72 hours is not expected to resolve all GT01 failures. Therefore, for IOC and MOC (Secure), in order to address the remaining failed migrations, DCC is proposing that the Gas Smart Metering System is excluded from migration where there is persistent failure of the GT01 check i.e. partial migration for the SMETS1 Installation only covering the CH, ESME, and associated devices in the premises. In the circumstance that the GSME is excluded from the migration process, there would be no scope for smart services to be provided for the Gas Smart Metering System via the DCC or via the SMETS1 SMSO (as the SMETS1 SMSO's access to the CHF is removed following Migration). DCC observes that the energy customer is extremely unlikely to be impacted by the ESME only migration, given that there isn't robust communication between the CH and GSME as demonstrated by the persistent GT01 check failures. On this basis, it is DCC's reasonable expectation that if the energy customer is not already receiving smart services related to the GSME then the Responsible Supplier is already making arrangements to manually read the gas meter. Separately, the Responsible Supplier would need to look at how best to meet their licence obligations related to the GSME.

DCC is proposing a slightly different process depending on whether the GSME is a Dormant Meter or an Active Meter as below.

- Dormant:*** Where the GSME is a Dormant Meter and thus DCC is responsible for migration (consistent with the deemed authorisation provided by Clause 4.27 of the TMAD), DCC proposes that there should be at least three migration attempts, each in separate migration weeks, to clearly demonstrate persistent failure i.e. consistency in the GT01 error occurring. Following the three failed attempts, DCC considers that migration should be attempted without the GSME. DCC notes that Responsible Suppliers will receive reporting on the GT01 failures via the existing reporting pursuant to the Migration Reporting Regime. Following these failures, the fourth migration attempt would be on the basis that the GSME details are excluded from the Migration Common File following a subsequent deemed authorisation.
- Active:*** Where the GSME is an Active Meter and thus the Responsible Supplier is required to schedule migration (as per the Migration Authorisation Mechanism), DCC considers it is for the Responsible Supplier to form a view on persistent failure related to the GT01 error. DCC notes that Responsible Suppliers will receive reporting on these failures via the existing reporting pursuant to the Migration Reporting Regime. The Responsible Supplier for the GSME would be able to instruct the DCC to proceed on the basis that the GSME details are excluded from the Migration Common File following a subsequent authorisation to Migrate the GSME. The details of the GSME, that is an Active Meter to be excluded, would be provided to DCC via file exchange using the DCC's SharePoint in line with similar SMETS1 processes.
- Mixed / Split:*** DCC does not consider that there needs to be any differential treatment for whether the ESME is an Active Meter or Dormant Meter as the normal authorisation regime will apply for the ESME in either case including any mixed SMETS1 Installations (i.e. where there is both a Dormant Meter and an Active Meter). This means that for the successful migration of the ESME only, there is an edge case where there is reliance on the Responsible Supplier for an Active GSME to provide an authorisation to allow the ESME to migration (without the GSME). This approach is also equivalent to the circumstance where the ESME with another Responsible Supplier required to provide the authorisation (i.e. a Split

Site) as the standard authorisation regime applies. This edge case exists already within the TMAD regime where authorisations are required from both Responsible Suppliers in order to migration to proceed as per Clause 4.17 of the TMAD.

In order to facilitate this approach, DCC is proposing two new Clauses 5.8B and 5.8C in the TMAD. These clauses provide separate provisions for exclusion of a Dormant Meter GSME and an Active Meter GSME respectively:

- Clause 5.8B of the TMAD allows DCC to proceed with the migration process for the SMETS1 Installation 'disregarding' the GSME where the GSME is a Dormant Meter; and
- Clause 5.8C of the TMAD allows the Responsible Supplier to request that the migration process proceeds for the SMETS1 Installation 'disregarding' the GSME where the GSME is an Active Meter.

For IOC, there is an unlikely edge case that a gas meter operating in prepayment mode is not migrated and thus would not be able to receive additional credit, however mitigations are in place to prevent this. DCC considers this to be unlikely given that the gas meter would need to have been in regular remote communications to be used in the prepayment mode. For IOC, it is possible for the SMETS1 SMSO to check whether the gas meter is operating in credit mode and therefore DCC has included an additional check (both Clause 5.8B and Clause 5.8C) to only allow migration in credit mode (as the incremental implement cost of this check is very low).

For MOC (Secure), a gas meter operating in prepayment mode would not lose the ability to be topped-up given the arrangements within the SMETS1 SMSO for this cohort. Additionally, for MOC (Secure), it is not possible for the SMETS1 SMSO to reliably check whether the gas meter is operating in credit mode and therefore DCC has not included an additional check as the incremental implement cost of this check for MOC (Secure) would be material.

There is also a proposed Clause 5.8D of the TMAD that prescribes how each Responsible Supplier will provide a list of any GSME to be excluded based on provision of a list of MPRNs and Device IDs. The term Request to Exclude has been added to the TMAD definitions in Clause 2 to describe this list. This Request to Exclude is provided on a 'complete', rather than 'incremental' basis. The Request to Exclude needs to be provided by 10:00 on a Wednesday morning and will only apply to the following Migration Week. In order to allow the Responsible Supplier to amend their excluded GSMEs, the approach allows for a Request to Exclude to be overwritten by a new Request to Exclude which may be an empty file i.e. a 'null' return. DCC will undertake checks to ensure that the Responsible Supplier is only providing a Request to Exclude in respect of their GSMEs. This check will be performed at the closest possible point to Migration Common File generation to prevent a Change of Supplier (CoS) event causing an MPRN to be excluded to account for the situation where that is not the intent of a new Responsible Supplier.

The migration process does not amend the whitelist on the CH, so there is an unlikely possibility that the GSME might re-establish communications with the CH at a later date but were this to arise any data would be ignored by the S1SP system without subsequent notification to the user e.g. any alert. It is important to note that such partial migration is a one-way process; there is no scope for DCC (within the existing solution) to start to provide smart services to a re-awakened GSME as the Device would not be commissioned in the S1SP (and included the SMI). The technical implementation of this varies by cohort; for IOC the GPF will be re-configured to stop forwarding any subsequent message arising (and a new Clause 5.8E permits such re-configuration) whereas for MOC (Secure) any message from the GSME is disregarded by the S1SP solution.

Following provision of this list, a subsequent Migration (following authorisation by either DCC or the Responsible Supplier) would then disregard the GSME. This implementation regime (i.e. via intervention at the MCF stage) has been adopted by DCC as it is a smaller solution change compared to amending the migration authorisation regime to explicitly allow for this approach as a

new migration process. The legal drafting at the end of Clause 5.8B and Clause 5.8C makes explicit provision for change to the MCF.

In relation to this change, DCC is also proposing a minor change in Table 16.11 to confirm the correct 'GSMEdetail' information is disregarded.

The result of this proposal is that the GSME will be excluded from the scope of Migration activities once the Migration of the electricity smart metering system that comprises part of the SMETS1 installation has completed. DCC has therefore included TMAD drafting in Clause 18.6 which states this exclusion.

Exclude GSME for GT01 Check	
Description	Where DCC is unable to establish communications with the GSME (i.e. persistent failure of the GT01 check), it is proposed to migrate the SMETS1 Installation with the ESME only and thus exclude the GSME. The rules presented above cover where the excluded GSME is either an Active Meter or a Dormant Meter.
Exclusion Type	Technical or operational barriers
Number of SMETS1 Installations	These changes to the TMAD are envisaged to allow the remaining 80% of failed migrations for IOC to proceed (past the GT01 check) which is estimated to be approximately 20,000 SMETS1 Installations that will migrate without the GSME. It is also envisaged to allow 100% of all failed migrations for MOC (Secure) to proceed (past the GT01 check) which is estimated to be approximate 13,000 SMETS1 Installations that will migrate without the GSME.
Rationale	It is beneficial to migrate the ESME and thus provide continuity of the smart services related to the ESME following migration rather than entirely excluding the SMETS1 Installation from migration.
Estimated Cost (where economically inefficient)	N/A

This change to allow migration without the GSME requires a change to the DCC System which will be implemented following testing via a SMETS1 Uplift (as Uplift 3.1) with the required test governance via TAG. DCC is planning for this to be deployed on 7 December 2021 as part of the December maintenance release.

Various 1 Q8	Do you agree with DCC's proposal to amend the TMAD to migrate SMETS1 Installations excluding the GSME in the circumstances described, and the associated instruction for DCC to exclude the GSME (where this is required) to be provided from the Supplier via SharePoint, together with the associated drafting in Clauses 5.8B, 5.8C, 5.8D, 5.8E, and 18.6 of the TMAD? Please provide a rationale for your views.
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## 10. An update on revisions to the SMETS1 PPMID Definition for FOC

The Unblocking 1 Consultation<sup>16</sup> set out that there are 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 SMETS1 PPMID devices to be added to the Eligible Products Combination List (EPCL) (and subsequently the Certified Products Combination List (CPL)), which prevents DCC from proposing EPCL entries comprising DMCs that contain such devices. In the Unblocking 1 consultation, DCC proposed 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 significantly reduced CPL data requirements). These entries on the EPCL are not expected to require testing and instead are planned 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). On 12 October 2021, DCC published an updated substantive equivalence guidance note<sup>17</sup> which included a new Section 2.7 covering this matter and the relevant entries are expected to be added to the EPCL on 29 November 2021.

Section of 3.1.1 of the Unblocking 1 Conclusion set out that two respondents indicated that technical changes were required for FOC to ensure the schema is populated correctly (IHD vs PPMID). Consequently, the Unblocking 1 Conclusion<sup>18</sup> set out that these changes were deferred for FOC and DCC's expectation was that the solution changes would be implemented on 7 December 2021, following appropriate testing. DCC now has an update on the position related to the variation of SMETS1 PPMID definition for FOC (GroupID = 'EA' or 'EB').

When pursuing the request for change the SMETS1 SMSO (where GroupID = 'EB') indicated to DCC that, following further analysis, the solution would never be needed for any SMETS1 Installation in their cohort. DCC considers that it is economically inefficient to take forward a solution development where GroupID = 'EB' (to allow migration as a SMETS1 IHD) where the solution will never be utilised.

When pursuing the request for change the SMETS1 SMSO (where GroupID = 'EA') indicated to DCC that, following further analysis, there are only approximately 1,000 SMETS1 Installations where the solution change is required to allow the updated definition of SMETS1 PPMID to be applied to their cohort. DCC considers that it is economically inefficient to take forward a solution development where GroupID = 'EA' (to allow migration as a SMETS1 IHD) where the solution would only be used for this limited number of SMETS1 Installations.

Thus, for FOC, DCC will not be pursuing the SMETS1 PPMID definition amendment to the TMAD for December 2021, on the basis that it would be economically inefficient for DCC commit funds to a solution change that will never be used.

<sup>16</sup> <https://www.smartdcc.co.uk/customer-engagement/smets1-consultation-unblocking-1/>

<sup>17</sup> <https://www.smartdcc.co.uk/media/6523/dcc-guidance-note-substantive-equivalence-v50.pdf>

<sup>18</sup> <https://www.smartdcc.co.uk/customer-engagement/smets1-conclusion-unblocking-1/>

For GroupID = 'EA', DCC is presently engaged with the SMETS1 SMSO to explore alternative approaches to Migrating impacted 1,000 SMETS1 Installations and will bring forward proposal in this area in due course.

**Various 1  
Q9**

Do you agree with DCC's proposal not to pursue an amendment the definition of SMETS1 PPMID where GroupID = 'EA' or 'EB' as previously described in the Unblocking 1 Conclusion. Please provide a rationale for your views.

## 11. TMAD Expiry Date

Clause 1.3 of the TMAD set out that the entire TMAD will cease to apply on 31 December 2021. On the basis that SMETS1 migration will not be materially complete by 31 December 2021 and with final EPCL entries due before Christmas 2021, DCC proposes changing the expiry date to 31 December 2022.

**Various 1  
Q10**

Do you agree with DCC's proposal to amend the TMAD expiry date to be 31 December 2022?

## 12. Next Steps

As detailed in the introduction, given the range of matters within this consultation, DCC is holding a stakeholder briefing on matters covered by this consultation on Wednesday 3 November 2021 between 1430 and 1530 via Microsoft Teams to enhance the effectiveness of the consultation. Please email [customerengagement@smartdcc.co.uk](mailto:customerengagement@smartdcc.co.uk) if you wish to be invited to this briefing.

Following the closure of this consultation, DCC will take into account respondents' views, and, subject to the consultation responses received, submit to the Department for Business, Energy and Industrial Strategy (BEIS) a conclusions report for the Secretary of State consistent with the requirements set out in Clause 1.6 of the TMAD. DCC is aiming to provide a conclusions report to BEIS no later than 26 November 2021.

Where the Secretary of State accepts the finding in DCC's conclusions report related to proposed exclusions and thus re-designates the TMAD and SMETS1 SVTAD, the relevant SMETS1 Installations will be excluded from the scope of migration and/or SMETS1 SMSs not eligible for enrolment / SMETS1 Services and/or SMETS1 PPMIDs ignored. The DCC will also commence monthly reporting of Excluded Categories to impacted Responsible Suppliers via the DCC SharePoint.

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 7 December 2021 or as soon as reasonably practicable within one month.

In order to expedite the re-designation of the TMAD and SMETS1 SVTAD, 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.

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.

**Various 1  
Q11**

Do you agree with the proposed re-designation date of 7 December 2021 for updates to the TMAD and SMETS1 SVTAD related to maximising migrations?

**Various 1  
Q12**

Do you agree with the proposed re-designation date of 7 December 2021 for updates to the TMAD related to changing the expiry date for the TMAD?

## 13. How to Respond

Please provide responses in the attached template by 1600 on 12 November 2021 to DCC at [consultations@smartdcc.co.uk](mailto: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](http://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](mailto:consultations@smartdcc.co.uk).

## 14. Attachments

Attachment	Title
1	Draft Notification Text on TMAD and SMETS1 SVTAD
2	DMCs Considered Uneconomic to Test
3	Response Template
4	TMAD v16.X Draft Redlined

Attachment	Title
5	SMETS1 SVTAD v8.X Draft Redlined

## Attachment 1

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

### **TMAD & SMETS1 SVTAD Draft Direction Text**

*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) and the SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) previously designated and incorporated into the SEC as Appendix AL and Appendix AK (respectively) are hereby re-designated and incorporated in the form set out in Annex [XX] and [YY] 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 these documents first being designated, or the continuing effectiveness of anything done in these documents prior to their re-designation (which shall have effect as if done under the re-designated documents).*

*This direction is also being notified to the SEC Administrator.*

## Attachment 2 –DMCs Considered Uneconomic to Test

The data in the table below is the list of DMCs proposed to be excluded.

Cohort	DMC #	Hub HW	Hub FW	ESME HW	ESME FW	GSME HW	GSME FW	PPMID Manufacturer	PPMID HW	PPMID FW	Operating Status	Installs
IOC	DMC1	Elster AM110R	3-07-09-P53-REV09	Elster AS300P	60250	Elster BKG4	00-10-94	Chameleon	IHD3-MS	2.11.01	Active	17
IOC	DMC 1	Elster AM110R	3-07-09-P53-REV09	Elster AS300P	60250	Elster BKG4	00-10-94	Chameleon	IHD3-MS	2.11.01	Mixed	2
IOC	DMC 1	Elster AM110R	3-07-09-P53-REV09	Elster AS300P	60250	Elster BKG4	00-10-94	Chameleon	IHD3-MS	2-11-01	Active	7
IOC	DMC 1	Elster AM110R	3-07-09-P53-REV09	Elster AS300P	60250			Chameleon	IHD3-MS	2-11-01	Active	3
IOC	DMC 1	Elster AM110R	3-07-09-P53-REV09	Elster AS300P	60250	Elster BKG4	00-10-94-RT2	Chameleon	IHD3-MS	2.11.01	Active	2
IOC	DMC 1	Elster AM110R	3-07-09-P53-REV09	Elster AS300P	60250	Elster BKG4	00-10-94	Chameleon	IHD3-MS	2-11-01	Dormant	3
IOC	DMC 1	Elster AM110R	3-07-09-P53-REV09	Elster AS300P	60250	Elster BKG4	00-10-94	Chameleon	IHD3-MS	2.07.00	Active	4
IOC	DMC 1	Elster AM110R	3-07-09-P53-REV09	Elster AS300P	60250	Elster BKG4	00-10-94-RT2	Chameleon	IHD3-MS	2.07.00	Active	1
IOC	DMC 1	Elster AM110R	3-07-09-P53-REV09	Elster AS300P	60250			Chameleon	IHD3-MS	2.11.01	Active	2
IOC	DMC 2	Elster AM110R	3-07-09-P53-REV09	Elster AS300P	60250	Elster BK-G4 V2 EI5.03	02-06-17	STI	IHDLO1	S1-1v3	Dormant	1
IOC	DMC 3	Elster AM110R	3-07-09-P53-REV09	Elster AS300P	60250	Elster BK-G4 V2 EI5.03	02-06-17	Chameleon	IHD3-MS	2.11.01	Mixed	7
IOC	DMC 4	GE SGC1311	3-3-13	GE SGM1311	3-3-6	GE G4SZTV	4-24-16-3-6-42	Geo	Trio II	v1.14	Active	2
IOC	DMC 4	GE SGC1311	3-3-13	GE SGM1311	3-3-6	GE G4SZTV	4-24-16-3-6-42	Geo	Trio II	v1.14	Dormant	2
IOC	DMC 4	GE SGC1311	3-3-13	GE SGM1311	3-3-6	GE G4SZTV	4-24-16-3-6-42	Geo	Duet II	1.2.1.9.49	Mixed	1
IOC	DMC 4	GE SGC1311	3-3-13	GE SGM1311	3-3-6			Geo	PCK-TL-011	v1.14	Active	1
IOC	DMC 4	GE SGC1311	3-3-13	GE SGM1311	3-3-6	GE G4SZTV	4-24-16-3-6-42	Geo	PCK-TL-011	v1.17	Dormant	2
FOC-EB	DMC 5	SEAP-2001-V	2.2.8	E470 MK1	23.07.01.00	G370	03.00.01.67	Geo	Duet II	2.0.1.9.61	Active	3
FOC-EB	DMC 5	SEAP-2001-V	2.2.8	E470 MK1	23.07.01.00	G370	03.00.01.67	Geo	Duet II	2.0.1.9.61	Dormant	2
FOC-EA	DMC 6	SEAP-2001-V	2.2.8	E470 MK1	23.07.01.00	G370	03.00.01.61	L+G	P450 Pebble	4.21.0.0	Active	1