

# SMETS1 Consultation – Various 1

Stakeholder Briefing  
(version for DCC's website)

*We believe in making Britain more connected,  
so we can all lead smarter, greener lives.*

3 November 2021

DCC Public

In the bottom right corner, there are two overlapping circles. The one in the foreground is a large, solid magenta circle. Behind it and slightly to the left is a smaller, semi-transparent purple circle.

# Welcome & Introductions

## Housekeeping

- Please put yourself on mute unless you're speaking
- Type your questions in the Teams chat or raise your hand if you want to ask a question live as we go along
- Q & A opportunity to ask any clarification questions to help you respond effectively to the consultation
- Please note that this call will be recorded
- Today's slides will be made available on DCC's website following this webinar.

# Agenda

Items	Time Slot
Welcome & Introductions	14:30 – 14:35
Purpose & Consultation Timeline	14:35 – 14:40
A walk through the Consultation Topics	14:40 – 15:15
Question & Answer Session	15:15 – 15:30
Close & Next Steps	15:30

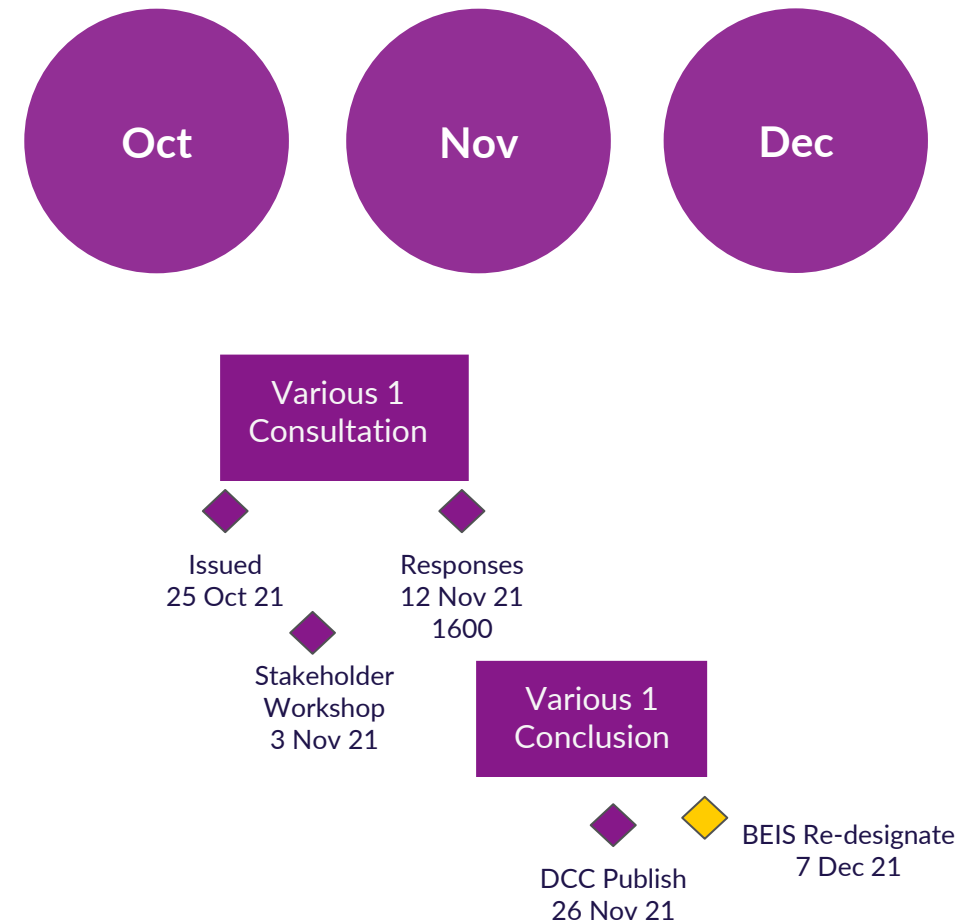
# Purpose & Timeline

## Stakeholder Briefing Purpose

- Enhance the effectiveness of the consultation
- Provide a high-level overview of the range of topics covered
- Offer stakeholders opportunity to obtain any clarifications

## Scope of the consultation

- Nine consultation topics
- Twelve questions related to these topics



# Background to Maximising Migrations

The consultation covers regulatory changes:

- TMAD is Appendix AL of the SEC covering detailed technical and procedural matters related to SMETS1 Migration
- SMETS1 SVTAD is Appendix AK of the SEC covering SMETS1 testing matters

Generally, DCC are making good progress with roughly **3.7 million SMETS1 Installations migrated** at the time this consultation was published. However, BEIS have recognised that in some situations, migration is not practicable or proportionate due to:

- Technical / operational issues
- Uneconomic to make the changes

In February 2021, BEIS introduced a TMAD regime for DCC to address these issues:

- Unblocking – DCC bring forward solution / regulatory changes to allow migration to process
- Exclusion – DCC can propose to formally exclude categories

There have been two prior Unblocking consultations earlier this year, and DCC is also pursuing some ‘unblocking’ activity that does not need regulatory change (e.g. data cleansing)

**The consequence of each exclusion is replacement with SMETS2+ by 31 December 2022 given existing Supplier Licence Obligations**

# Process Amendments

BEIS have instructed DCC to enhance the exclusion process which gives rise to TMAD changes and consequential change to SMETS1 SVTAD

Existing process is based on Secretary of State accepting DCC's recommendation for exclusions

- **Proposal is explicitly captured in a new Clause 18 of the TMAD as an 'Exclusion Category' either:**
  - Smart Metering System not to be enrolled – TMAD 18.2 (a)
  - SMETS1 Installation not to be migrated – TMAD 18.2 (b)
  - Don't need to pursue an entry on the EPCL – TMAD 18.2 (c)
- **Some legal changes to deal with conflicts between exclusions and general obligations to provide services**
- **Enhanced reporting**
  - Tell Responsible Suppliers the extent that they are impacted (where DCC has the data to do so) at the point of consultation
  - Monthly reporting for Responsible Suppliers on their end customer sites that are excluded (to account for CoS events)
  - Reporting provided by the MCC will a file containing MPAN/MPRN/Exclusion Category for each Responsible Supplier

## 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.

# Proposed Exclusion Category - Cryptographic Master Keys

**PROBLEM:** DCC is unable to obtain the correct Master Key for the CHF which prevents successful migration

- Scope is IOC and MOC (MDS) SMETS1 Installations with Dormant Meters
- Security access arrangements for SMETS1 based on keys
- Key rotation required during Migration to restrict access by the SMETS1 SMSO following Migration
- Master Key must be used to perform this key rotation and thus the lack of the Master Key is an unsurmountable technical problem

**ENVISAGED IMPACT:** 'Master Key Errors' Excluded Category in Clause 18.4 of the TMAD

- For IOC, 1 SMETS1 Installation containing only Dormant Meters
- For MOC (MDS), 12,071 SMETS1 Installations containing only Dormant Meters

## Various 1 Q2

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.

# Proposed Exclusion Category - No WAN Before Migration Attempted

**PROBLEM:** Due to WAN communication failures the SMETS1 SMSO is unable to upgrade the firmware / configure devices (prior to Migration) following DCC's request

- Scope is IOC SMETS1 Installations with Dormant Meters
- For some devices, firmware upgrade / configuration cannot be completed successfully as the required wide area network (WAN) communications cannot be established
- SMETS1 SMSO undertakes a series of attempts based on each DCC instruction for Dormant Meters
- DCC proposes three separate instructions to the SMETS1 SMSO demonstrates persistent failure

**ENVISAGED IMPACT:** 'No WAN Before Migration Attempted' Excluded Category in Clause 18.7 of the TMAD

- For IOC, 11,523 SMETS1 Installations containing only Dormant Meters

## 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.



# Proposed Exclusion Category - No WAN Attempting Migration

**PROBLEM:** Migration is prevented where there is no WAN communication within the previous 7 days

- Scope is IOC and MOC (MDS) SMETS1 Installations with Dormant Meters
- Clause 5.12 (c) of the TMAD checks for WAN communication in the previous seven days during Migration (MA112 error code in the MEHRS)
- This check is after any firmware upgrade / configuration has been performed
- DCC proposes three migration attempts each in separate weeks demonstrates persistent failure with MA112

**ENVISAGED IMPACT:** 'No WAN Attempting Migration' Excluded Category in Clause 18.8 of the TMAD

- Across IOC and MOC (MDS), 470 SMETS1 Installations containing only Dormant Meters

## 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.

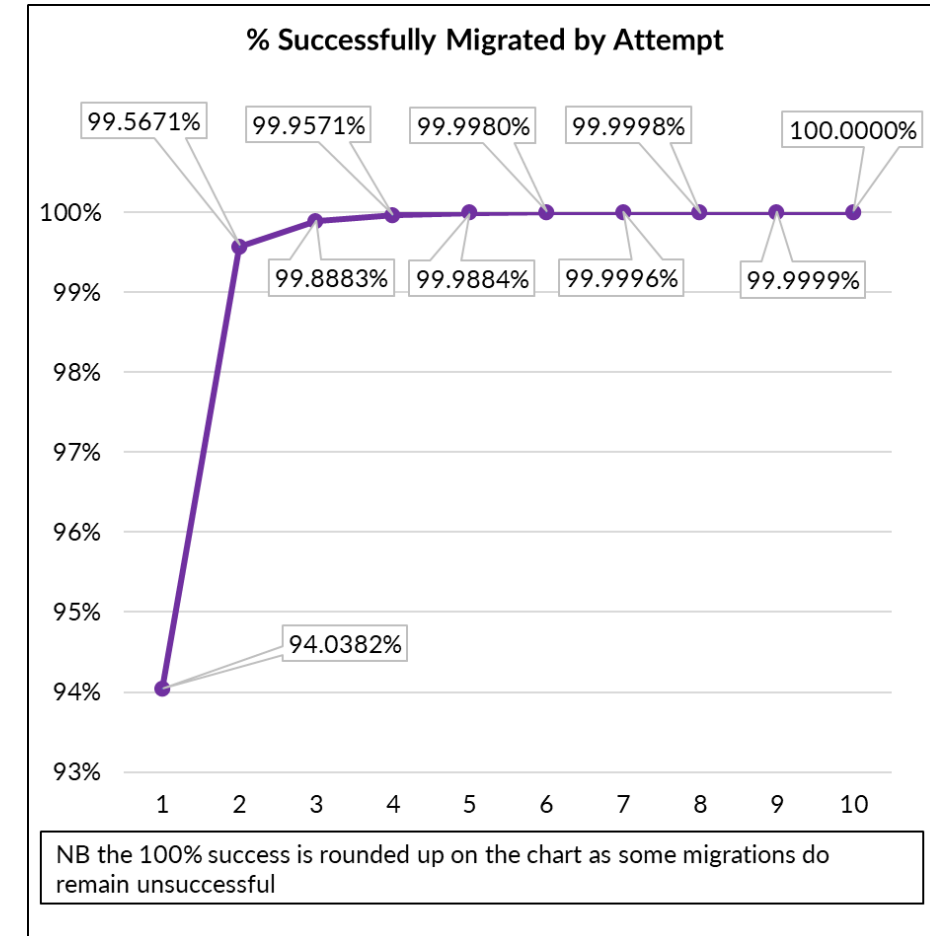
# Proposed Exclusion Category - At Least Five Migration Attempts

**PROBLEM:** Migration attempts consistently fail for a range of reasons

- Scope is IOC, MOC (MDS), and MOC (Secure) SMETS1 Installations with Dormant Meters
- Inefficient to undertake never ending cycles of Migration retries, instead focus on success
- Roughly 400 distinct error codes given the sub-step reporting for failure outcomes during migration
- No technical solution to resolving such errors (except data errors from Table 5.10)
- DCC proposes five migration attempts each in separate weeks demonstrates persistent failure based on experience to date (except for Table 5.10 errors)

**ENVISAGED IMPACT:** 'Five Retries Attempting Migration' Excluded Category in Clause 18.9 of the TMAD.

- Across IOC, MOC (MDS), and MOC (Secure), 1,502 SMETS1 Installations containing only Dormant Meters



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.

# Proposal that specified DMCs are not economic to test under the DMCT Process and should also be excluded from Migration

**PROBLEM 1:** Where it is uneconomic to test under the DMCT Process there is no scope for an entry to be made to the EPCL

**PROBLEM 2:** Each SMETS1 installation must align to an EPCL entry for Migration to take place

- DCC needs to test 6 DMCs under the DMCT Process to allow 63 SMETS1 Installations to be Migrated across IOC and FOC
- DCC considers it is uneconomic to commit £670,000 for testing these 6 DMC under the DMCT Process
- DCC needs to make a recommendation to Secretary of State for their decision following consultation
- DCC proposes an exclusion where Secretary of State decides it is ‘uneconomic to test’ under the DMCT Process (NB there is a safeguard, the Secretary of State may direct DCC to take further action if considered appropriate)

## ENVISAGED IMPACT: ‘Uneconomic to Test’ Excluded Category in Clause 18.4 of the TMAD

- Across IOC and FOC, 63 SMETS1 Installations

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.

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

**PROBLEM:** Migration attempts consistently fail due to no HAN communication with the gas meter (reported as GT01 check failure)

- Scope is IOC and MOC (Secure) SMETS1 Installations
- GT01 check is for HAN communication with the gas meter in previous 72 hours (changing from 4 November 2021)
- Proposal is to migrate only the electricity meter and exclude the gas meter. For IOC check that payment mode is 'credit' is made but not needed for MOC (Secure) given differing solutions by cohort
- DCC will check who is the Responsible Supplier and for CoS events
- For Dormant Meters, DCC propose three migration attempts, each in separate weeks demonstrates persistent failure of the gas meter communications based on experience to date
- For Active Meters, Responsible Supplier to decide when to exclude the gas meter

**ENVISAGED IMPACT:** 'Consistent GT01 Check Failure' Excluded Category in Clause 18.6 of the TMAD

- Across IOC, 20,000 electricity meters migrated / gas meters excluded
- Across MOC (Secure), 13,000 electricity meters migrated / gas meters excluded

**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.

# An update on revisions to the SMETS1 PPMID Definition for FOC

In summer 2021, the Unblocking 1 consultation / conclusion set out some data issues related to in-home display Devices that was preventing EPCL entries / migration. For IOC, MOC(MDS), and MOC (Secure), the definition of SMETS1 PPMID was varied to allow some in-home display Devices to be classified as a SMETS1 IHD to allow some unblocking.

**Following stakeholder feedback, the variation to the definition was deferred pending a solution change (expected for December 2021) for each of the SMETS1 SMSOs in FOC (GroupID = 'EA' or 'EB')**

- For GroupID = 'EB', the SMETS1 SMSO advises that, following further analysis, the solution would never be needed for any SMETS1 Installation in their cohort. Economically inefficient to take forward a solution development that will never be used.
- For GroupID = 'EA', the SMETS1 SMSO advises that, following further analysis, there are approximately 1,000 SMETS1 Installations unblocked by the solution change. Economically inefficient to take forward a solution development 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.**

**For GroupID = 'EA', DCC is 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.

# TMAD Expiry Date

The current TMAD expiry date is set to 31 December 2021

- SMETS1 migration will not be materially complete by 31 December 2021
- 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?

# Consultation Process Questions

The consultation has two regulatory process questions on the proposed date on 7 December 2021 for the Secretary of State to re-designate the changes.

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?

# Question & Answer Session



# Summary & Next Steps

In summary the SMETS1 Consultation - Various 1 covers regulatory changes for:

- Exclusion of approximately 25,000 SMETS1 Installations across a range of issues
- Partial unblocking of 33,000 SMETS1 Installations:
  - migrate electricity meter; and
  - exclude gas meter

Please do respond to the consultation via the template on the Smart DCC website: <https://www.smartdcc.co.uk/customer-engagement/smets1-consultation-various-1/>

Completed templates should be emailed to the regulation team via [consultations@smartdcc.co.uk](mailto:consultations@smartdcc.co.uk) by 16:00 on 12 November 2021.

*NB Please fill out the short feedback survey linked in the Teams chat or scan this QR code to share your views on the webinar. This will help us further improve our customer engagement.*





# Thank you

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