

SMETS1 Conclusions Various 1 Part 1

A SMETS1 conclusion on a proposal by DCC to exclude / unblock certain categories of SMETS1 Installations from Migration, and extend the Expiry Date for the TMAD.

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1. Introduction and Context

A number of energy suppliers have installed first generation smart devices (known as SMETS1 devices) in consumers' premises across Great Britain. The Data Communications Company (DCC) has designed a solution for the enrolment of SMETS1 devices into its network. Part of DCC's plan to deliver SMETS1 services involves a detailed approach for migrating SMETS1 Installations into DCC's systems.

The detailed technical and procedural requirements of the migration approach are set out in the SMETS1 Transition and Migration Approach Document (TMAD). The SEC Variation Testing Approach Document for SMETS1 Services (SMETS1 SVTAD) sets out the rights and obligations for a range of SMETS1 testing matters including Systems Integration Testing (SIT) and the DMCT Process. The SMETS1 SVTAD also provides the framework for the Migration Testing Approach Document (MTAD) which sets out the rights and obligations for Migration Testing (MT). The SMETS1 SVTAD is Appendix AK of the Smart Energy Code¹ (SEC) and the TMAD is Appendix AL of the SEC. The latest version of the SEC was published on 17 November 2021 as v52.0.

In December 2020, the Department for Business Energy and Industrial Strategy (BEIS) consulted² on changes to the TMAD to provide a framework to develop options for the Migration of SMETS1 Installations comprising Device Model Combinations (DMCs) which DCC consider currently blocked. In February 2021, BEIS concluded³ on these changes, introducing Clauses 1.4 to 1.9 in the TMAD which provide a transparent process for promptly assessing SMETS1 Installations currently blocked for Migration.

On 25 October 2021, DCC consulted⁴ on a range of regulatory matters related to SMETS1 as per the points below:

- 1) amendments to the maximising migration process in the TMAD (as requested by BEIS) which included a few consequential amendments to the SMETS1 SVTAD;
- 2) proposals for four distinct exclusion categories where migrations will not be pursued:
 - a) missing master keys;
 - b) no WAN communications before migration (to support firmware upgrade and configuration);
 - c) no WAN communications attempting migration; and
 - d) at least five migration attempts (i.e. consistent failures to migrate);
- 3) proposal to migrate only the electricity meter (within a SMETS1 Installation) and a corresponding exclusion of the gas meter due to HAN related errors (GT01);
- 4) proposal that certain DMCs are uneconomic to test under the DMCT Process and a corresponding exclusion for the impacted SMETS1 Installations;

¹ <https://smartenergycodecompany.co.uk/the-smart-energy-code-2/>.

² The BEIS consultation is available via <https://smartenergycodecompany.co.uk/latest-news/secretary-of-state-direction-on-the-smets1-tmad-and-further-smets1-tmad-consultation/>

³ The BEIS conclusion is available via <https://smartenergycodecompany.co.uk/latest-news/sec-v35-0-implemented-to-support-the-dcc-smets1-service/>

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

- 5) an update on the definition change for a SMETS1 PPMID in FOC; and
- 6) extending the TMAD expiry date to be 31 December 2022.

This document provides a 'Part 1' response to that consultation consistent with the regulatory requirements for amending the TMAD and SMETS1 SVTAD. Please note that conclusion on the matters related to the proposal that certain DMCs are uneconomic to test under the DMCT Process (Various 1 Q6) and a corresponding exclusion for the impacted SMETS1 Installations (Various 1 Q7) are not included in this conclusion document given resource constraints focused on adding additional entries on the EPCL before the end of 2021. DCC has amended the conclusion version of the TMAD so that the proposed amendment for this exclusion category (that was in Clause 18.5 in the consultation version of the TMAD) is not included. The expectation is that DCC will be concluding separately on these aspects via a 'Part 2' conclusion which DCC intends to publish early in 2022.

2. Stakeholder Engagement

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

2.1. Questions

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

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.
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.
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.
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.
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.
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.

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.
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.
Various 1 Q10	Do you agree with DCC's proposal to amend the TMAD expiry date to be 31 December 2022?
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?

Table 1 - Consultation Questions

2.2. Webinar

Given the broad range of matters within the consultation, DCC held a stakeholder briefing webinar⁵ on the matters covered by this consultation on 3 November 2021 between 1430 and 1530 via Microsoft Teams. The purpose of the webinar was:

- to enhance the effectiveness of the consultation;
- to provide a high-level overview of the range of topics covered; and
- to offer stakeholders an opportunity to obtain any clarifications.

2.3. Responses

Stakeholders were invited to respond to the consultation issued by 16:00 on Friday 12 November 2021 using the response template⁶ that was provided.

DCC held a joint meeting with two energy suppliers to explore concerns raised on the webinar; further details are provided below.

DCC received a written response from ten respondents regarding this consultation. Further to these responses, DCC had a separate meeting with eight respondents to explore certain matters raised in their responses where necessary; further details are provided below. In some cases, these discussions resulted in an amended view of a respondent's response; these updates were agreed with each respondent and are captured below.

⁵ The slides from the webinar are available via https://www.smartdcc.co.uk/media/6559/various1_workshop_3nov2021_website.pdf

⁶ https://www.smartdcc.co.uk/media/6554/smets1_consultation_various_1_response_template.docx

3. Analysis of Responses

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

DCC has structured the analysis of responses by question, providing an overview of the comments received and DCC's reply including a statement on any areas of disagreement.

3.1. General Comments

One respondent made some general comments as well as addressing the specific questions.

This respondent welcomed DCC's Various 1 consultation, stating that it is vital for DCC to take appropriate steps to maximise the number of SMETS1 installations Migrated whilst being mindful of the operational and testing costs. This respondent also stressed that it is important for DCC to expedite activity related to unblocking SMETS1 Installations to ensure that enrolment benefits for energy consumers can be realised, but also ensuring that SMETS1 SMSO services can be decommissioned by suppliers in an efficient and timely way. DCC is committing to taking forward maximising migration activity in an economically efficient manner and expediting maximising migration activity.

3.2. Process Amendments to TMAD and Consequential change to SMETS1 SVTAD (Various 1 Q1)

DCC sought views on the proposal to amend the exclusion process asking: ***“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.”***

3.2.1. Respondents' Comments / DCC Analysis / Clarifications

Nine of the respondents provided a response to this question. Eight of these respondents supported the proposed amendments.

Two respondents provided a supportive response to this question without further comment.

One respondent expressed support for the proposed changes to the exclusion process indicating that some aspects of the changes will help them have a view of impacted installations in their portfolio.

Four respondents expressed support for the proposed changes to the exclusion process indicating that the additional reporting will be beneficial. One of these respondents indicated that it is important that both energy suppliers and MAPs are consulted on each new Exclusion Category. DCC agrees that stakeholder engagement is important and can confirm that each new Exclusion Category will be added to Clause 18 of the TMAD via re-designation of the TMAD by the Secretary of State following public consultation (consistent with the regulatory regime for TMAD amendment).

One respondent (who is a MAP) accepted that these changes are necessary but expressed concern that the approach does not provide reporting to MAPs given that DCC's engagement on exclusions is solely with Responsible Supplier. DCC understands the concerns raised by the respondent in relation to the overall regulatory structure with DCC's relationship with solely Responsible Suppliers rather than MAPs. This concern is not something that can be addressed via an amendment to the TMAD, DCC would encourage all

MAPs to engage with their customers on matters related to SMETS1 Installations and their Migration.

One respondent expressed concern regarding the approach to exclusions related to persistent failure for SMETS1 Installations containing solely Dormant Meters. The respondent proposed that the Responsible Supplier should be given the opportunity to request further migration attempts where the criteria for persistent failure has been met for an exclusion category. Another respondent, that was supportive of the approach, also made a similar proposal. Their proposal would allow the Responsible Supplier to consider taking action to resolve an issue e.g. arrange a site visit to reboot of CH for dormant devices. If this approach was adopted, the respondent would be content for the exclusion process / categories related to persistent failure to be implemented. DCC discussed this matter with these respondents and DCC proposes to adopt this approach via amendments to Clause 18 of the TMAD to allow the Responsible Supplier the right to request re-attempt of solely Dormant Migrations prior to the decommissioning of the relevant Requesting Party.

3.2.2. Areas of Unresolved Disagreement

There were no remaining areas of disagreement with the changes proposed to the TMAD and SMETS1 SVTAD related to amendments to the exclusions process.

3.2.3. Summary

As a result of these responses received the conclusion version of the TMAD has amendments to Clause 18 of the TMAD to allow the Responsible Supplier the right to request re-attempt of solely Dormant Migrations prior to the decommissioning of the relevant Requesting Party. The details of these changes are covered further below against the relevant exclusion categories.

DCC proposes that the Secretary of State re-designates the amendments to the TMAD covering Clauses 1.5, 1.6, 1.7, 1.9, 3.15 (g), 18.1, 18.2, and 18.3 and the consequential change to the SMETS1 SVTAD such that the process related changes regarding exclusions are adopted.

3.3. Proposed Exclusion Category - Cryptographic Master Keys (Various 1 Q2)

DCC sought views on the proposal for an Exclusion Category covering on missing master keys for IOC and MOC (MDS) asking: ***“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.”***

3.3.1. Respondents’ Comments / DCC Analysis / Clarifications

Nine of the respondents provided a response to this question. All nine of these respondents supported the proposed exclusion category based on the Master Key for the CHF being unavailable.

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

One respondent agreed with the proposal for an exclusion where the Master Key is missing indicating that migrations cannot be successful without the correct Master Key.

Two respondents agreed with the principle of an exclusion based on the missing Master Key but sought assurance that there is no technical solution to resolve this matter. DCC can confirm that there is no solution available as the Master Key provides a fundamental security control for remote access to the Installation. These respondents also queried whether this exclusion would also apply to Active Devices. DCC can confirm that exclusion is solely focused on dormant Installations and instructing Migration remains the responsibility of the Responsible Supplier for each Active Meter. Also, for each Active Meter where the Master Key for the CH is missing, any attempted Migration will similarly be unsuccessful without the correct Master Key.

One respondent (who is a MAP) agreed with the proposal and sought confirmation that the relevant MAPs had been approached to obtain the missing Master Keys regarding the Devices impacted by this specific exclusion for IOC and MOC (MDS). DCC can confirm that relevant MAPs have been contacted.

One respondent agreed with the proposal but also proposed that this exclusion should be extended to apply to Active Devices. The respondent was also concerned that the current reporting of exclusions did not cover this matter. DCC discussed this matter with the respondent. DCC confirmed that this matter has been reported to the impacted Responsible Suppliers. DCC explained to the respondent that this exclusion is solely focused on dormant exclusions and instructing Migration remains the responsibility of the Responsible Supplier for each Active Meter. Also, for each Active Meter where the Master Key for the CH is missing, any attempted Migration will similarly be unsuccessful without the correct Master Key thus there is no need for any such Active exclusion. The respondent's concern is that there is no sharing of insight gained related to persistent failure for Active Meters i.e. there is a risk of duplication of effort on churn from Active to Dormant. The respondent proposed that DCC would maintain some form of central register of exclusions by the Responsible Supplier for Active Meters. The respondent considers this would be helpful when focusing on closure of the Requesting Party for each cohort to show the overall portfolio both Active and Dormant. DCC indicated that it will consider this matter when exploring de-commissioning of the Requesting Party for each cohort.

One respondent expressed concern regarding the proposed exclusion based on the missing Master Key, seeking insight into the scope for Migrating such SMETS1 Installations where there is no available Master Key. DCC discussed this matter with the Respondent. The Respondent was content with DCC's explanation that there was no technical solution for this issue as the Master Key is a fundamental security control for remote access to the Installation. On this basis, the proposed exclusion was acceptable to the Respondent.

3.3.2. Areas of Unresolved Disagreement

There were no remaining areas of disagreement with the changes proposed to the TMAD related to the Exclusion Category covering the missing master keys for IOC and MOC (MDS).

3.3.3. Summary

There are no material drafting changes resulting from the consultation process related to the missing Master Key for the CH.

DCC proposes that the Secretary of State re-designates the amendment to TMAD to include Clause 18.4 such that any SMETS1 Installation containing solely Dormant Meters (for IOC and MOC (MDS)) are excluded where DCC has been unable to obtain the correct Master Key for the CH.

3.4. Proposed Exclusion Category - No WAN Before Migration Attempted (Various 1 Q3)

DCC sought views on the proposal for an Exclusion Category based on no WAN before migration (for IOC only) asking: ***“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.”***

3.4.1. Respondents’ Comments / DCC Analysis / Clarifications

All ten of the respondents provided a response to this question. Eight of these respondents supported the proposed exclusion category based on the persistent failure upgrade firmware / reconfigure due to no WAN.

Two respondents provided a supportive response to this question without further comment.

One respondent expressed support for the proposed exclusion. This respondent indicated that ‘No WAN’ preventing upgrade / configuration is unlikely to change and thus presented reasonable grounds for exclusion. The respondent stated that, in some cases, it is possible that the meter may have been removed hence the ‘No WAN’ situation. The respondent requested that the status of any meter with three unsuccessful attempts is clearly stated on any reporting provided to suppliers. DCC can confirm that exclusion reporting will detail the status where persistent failure to upgrade / configure leads to exclusion.

Two respondents expressed support for the proposal to exclude where there is persistent failure to upgrade / configure for IOC. These respondents also proposed that the Responsible Supplier should be given the opportunity to request further migration attempts where the criteria for persistent failure have been met for this exclusion category. Their proposal would allow the Responsible Supplier to consider taking action to resolve an issue e.g. arrange a site visit to assess the situation. DCC proposes to adopt this approach via amendments to Clause 18.6 of the TMAD to allow the Responsible Supplier the right to request re-attempt prior to the decommissioning of the relevant Requesting Party. These respondents indicated that for Active meters, Responsible Suppliers should be able to make as many attempts as they believe is prudent and make the decision on migration feasibility themselves. DCC agrees that it should not be making such decisions for Active Meters prior to the de-commissioning of the Requesting Party for each cohort as prescribed in Clause 7 of the TMAD.

One respondent (who is a MAP) indicated that they are unable to support this proposal as the approach does not provide reporting to MAPs and therefore, they (and other MAPs) are unable to assess the impact on their individual businesses. However, the respondent indicated the principle of such an exclusion was acceptable; the respondent stated that design of the upgrade process for IOC with multiple attempts over a two to four week period shows that where the failure to upgrade is caused by no WAN, reasonable efforts have been made with three such attempts. DCC welcomes acceptance of this principle by the Respondent. DCC understands the concerns raised by the respondent in relation to the overall regulatory structure with DCC’s relationship being with Responsible Suppliers rather than MAPs. DCC would encourage all MAPs to engage with their customers on matters related to SMETS1 Installation that have failed firmware upgrade / configuration.

One respondent agreed with the proposal to exclude SMETS1 installations when it has not been possible to upgrade or reconfigure installations at least three times due to no WAN coverage. This respondent accepted that this exclusion could only be applicable to Dormant

devices given it was a pre-migration activity by DCC. However, this respondent indicated that there will be a significant number of SMETS1 installations containing Active Devices that Responsible Suppliers will not be migrating for the same failure to upgrade / configure. The respondent noted that details of these excluded active installations will not be known to DCC or wider industry stakeholders under these proposals. DCC discussed the respondent's concerns related to exclusions by the Responsible Supplier for Active Meters. The respondent's concern is that there is no sharing of insight gained related to persistent failure for Active Meters i.e. there is a risk of duplication of effort on churn. The respondent proposed that DCC would maintain some form of central register of exclusions by the Responsible Supplier for Active Meters. The respondent considers this would be helpful when focusing on closure of the Requesting Party for each cohort to show the overall portfolio both Active and Dormant. DCC indicated that it will consider this matter when exploring Requesting Party closure.

One respondent accepted that persistent firmware upgrade failure was an acceptable exclusion for IOC. This respondent also proposed that the Responsible Supplier should be given the opportunity to request further migration attempts where the criteria for persistent failure has been met for this exclusion category. Their proposal would allow the Responsible Supplier to consider taking action to resolve an issue e.g. arrange a site visit to assess the situation. DCC proposes to adopt this approach via amendments to Clause 18 of the TMAD to allow the Responsible Supplier the right to request re-attempt prior to the decommissioning of the relevant Requesting Party.

One respondent stated that there is a high probability that device(s) will establish WAN communication and hence, become eligible for migration. DCC agrees with the respondent that there is a high probability that WAN communications can be established to allow firmware upgrade (NB this is demonstrated by the successful firmware upgrades to date for IOC). However, operational evidence indicates that there are some SMETS1 Installations where WAN communications cannot be established to allow firmware upgrade. Also, this respondent stated that three retries is not a guaranteed criterion to mark the devices as non-communicating due to the nature of mobile communication networks. DCC discussed this matter with the respondent. The respondent accepted DCC's explanation that, for IOC, it was not three single retries but a series of retry attempts to deploy firmware. The consultation also described that this will be based on each of three instructions by DCC to the SMETS1 SMSO for IOC. The respondent expressed concern that the approach to IOC would, by default, set a precedent for MOC (Secure). DCC explained that it would be looking for appropriate evidence of persistent failure for MOC (Secure). DCC notes that in some circumstances the definition of persistent failure for other cohorts may be different compared to IOC; DCC will be reviewing appropriate evidence for other cohorts in due course to support introduction of additional exclusion categories following further consultation.

One respondent did not express a view on this specific exclusion category as they are an energy supplier with a limited number of IOC devices. This respondent made a general comment that all efforts should be made to maximise migrations and minimise the number of devices which must be replaced. DCC agrees with their general view that exclusions should be minimised where possible as it maximises smart metering benefits.

3.4.2. Areas of Unresolved Disagreement

There were no remaining areas of disagreement with the changes proposed to the TMAD (with the amendments set out above) related to the Exclusion Category based on no WAN before migration.

3.4.3. Summary

As a result of these responses received the conclusion version of the TMAD has amendments to Clause 18.6 of the TMAD to allow the Responsible Supplier the right to request re-attempt of solely Dormant Migrations prior to the decommissioning of the relevant Requesting Party.

DCC proposes that the Secretary of State re-designates the amendment to the TMAD to include Clause 18.6 such that any SMETS1 Installation containing solely Dormant Meters (for IOC) are excluded where three persistent failure to upgrade / configure has been demonstrated following three unsuccessful attempts by the SMETS1 SMSO.

3.5. Proposed Exclusion Category - No WAN Attempting Migration (Various 1 Q4)

DCC sought views on the proposal for an Exclusion Category based on no WAN attempting migration for IOC and MOC (MDS) asking: ***“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.”***

3.5.1. Respondents’ Comments / DCC Analysis / Clarifications

All ten of the respondents provided a response to this question. Nine of these respondents supported the proposed exclusion category based on the persistent failure to migrate due to no WAN.

One respondent provided a supportive response to this question without further comment.

One respondent indicated support for the exclusion based on persistent no WAN failure in the 7 days prior to a migration attempt on the basis that a limited number of dormant SMETS1 installations are impacted by this exclusion for IOC and MOC (MDS).

One respondent expressed support for the proposed exclusion. This respondent indicated that ‘No WAN’ preventing migration is unlikely to change and thus reasonable grounds for exclusion. The respondent stated that, in some cases, it is possible that the meter may have been removed hence the ‘No WAN’ situation. The respondent requested that the status of any meter with three unsuccessful attempts is clearly stated on any reporting provided to suppliers. DCC can confirm that exclusion reporting will detail the status where persistent failure to upgrade / configure leads to exclusion.

Two respondents expressed caveated support for the proposal to exclude where there is persistent failure to migrate i.e. there have been three failed migration attempts due to WAN coverage issues. Both respondents also sought clarity on which cohorts are impacted by this exclusion and the evidence presented in the consultation. DCC can confirm this exclusion is applicable to IOC and MOC (MDS). The consultation set out that, based on data so far, DCC has observed this MA112 WAN check error code for 12,135 different CHF’s but most were successfully migrated on a reattempt. There are 470 SMETS1 Installations where this failure is considered persistent and thus currently blocking migration. These respondents also proposed that the Responsible Supplier should be given the opportunity to request further migration attempts where the criteria for persistent failure has been met for this exclusion category. Their proposal would allow the Responsible Supplier to consider taking action to resolve an issue e.g. arrange a site visit to assess the situation. DCC proposes to adopt this approach via amendments to Clause 18 of the TMAD to allow the Responsible Supplier the right to request a re-attempt prior to the decommissioning of the relevant Requesting Party.

One respondent (who is a MAP) indicated that it is unable to assess the impact on their individual business as the approach does not provide reporting to MAPs. DCC understands the concern raised by the respondent in relation to the overall regulatory structure where DCC's relationship is with the Responsible Suppliers rather than the MAPs. DCC would encourage all MAPs to engage with their customers on matters related to SMETS1 Installation that have failed firmware upgrade / configuration due to no WAN coverage at least three times. This respondent asked for confirmation that there would be further consultation if this exclusion is extended to other cohorts. DCC can confirm that further consultation will take place before any amendments / extension of any exclusion categories.

One respondent agreed with the proposal to exclude SMETS1 installations when a migration request has failed due to no WAN coverage at least three times. This respondent highlighted an error in the TMAD drafting as it didn't restrict this exclusion to only dormant meters. DCC accepts that the TMAD drafting had an error and has amended Clause 18.7 (b) (in the revised TMAD) to be solely dormant meters. This respondent expressed the view that this exclusion should be extended to apply to both active and dormant installations as WAN coverage issues apply to the location respective of whether the devices are active or dormant. DCC discussed this point with the respondent and confirmed that any SMETS1 Installation containing one or more Active Meters will be re-attempted for migration based on authorisation from the Responsible Suppliers for the Active Meters. The respondent accepted DCC explanation on this matter.

One respondent accepted it is not possible for SMETS1 Installations to be migrated where the Requesting Party is unable to establish a WAN connection with the Communications Hub. This respondent sought clarity on the rationale for limiting the number of attempts where migrations fail on a repeated basis as a result of no WAN and any cost implications. There are capacity constraints within DCC's migration solution as described in the Migration Scaling Methodology; it is clearly inefficient for DCC to continue endless retries where persistent failure has been demonstrated. DCC discussed this matter with the respondent. This respondent has also proposed that the Responsible Supplier should be given the opportunity to request further migration attempts where the criteria for persistent failure has been met for this exclusion category. Their proposal would allow the Responsible Supplier to consider taking action to resolve an issue e.g. arrange a site visit to assess the situation. DCC proposes to adopt this approach via amendments to Clause 18 of the TMAD to allow the Responsible Supplier the right to request re-attempt prior to the decommissioning of the relevant Requesting Party.

One respondent stated that there is a high probability that device(s) will establish WAN communication and hence, become eligible for migration. DCC agrees with the respondent that there is high probability that WAN communications will be established to allow migrations to commence (NB this is demonstrated by the successful migrations to date for IOC). However, operational evidence indicates that there are some SMETS1 Installations where WAN communications cannot be established to allow successful Migration. Also, this respondent stated that three retries is not a guaranteed criterion to mark the devices as non-communicating due to the nature of mobile communication networks. DCC discussed this matter with the respondent. The respondent accepted DCC's explanation that, for IOC, it was not three single retries at migration, rather it is a 'no WAN in the previous 7 days' failure during each migration attempt as described in detail in the consultation document. The respondent expressed concern that the approach to IOC would, by default, set a precedent for MOC (Secure). DCC explained that it would be looking for appropriate evidence of persistent failure for MOC (Secure). DCC notes that in some circumstances the definition of persistent failure for other cohorts may be different compared to IOC; DCC will be reviewing appropriate evidence for other cohorts in due course to support introduction of additional exclusion categories following further consultation.

One respondent expressed general support for the principle proposed by DCC but raised concern that three migration attempts each in a separate migration week (as proposed in Clause 18.7 (c)) didn't demonstrate persistent failure based on their operational experience. The respondent considered that the proposed approach may mean that certain SMETS1 Installations may be unnecessarily excluded as a result of a combination of short-term transitory or localised issues (e.g. cell site maintenance, weather conditions, etc.) that can affect WAN coverage. This respondent indicated that a longer period would be prudent suggesting an elapsed timeframe of two months. DCC accepts that the principle of the 'no WAN' exclusion should be based on demonstrating persistent failure. DCC has discussed the concerns raised with the respondent. The respondent confirmed that an alternative formulation that captured the concept of an extended period to demonstrate persistent failure would be acceptable e.g. once per fortnight. On this basis, DCC has amended the approach to extend the period for the three failed attempts account for the concerns raised related to demonstrating persistent failure. The revised approach (as captured by the update to Clause 18.7 (c) in the TMAD) is that each of the three separate attempts to migrate shall be in non-contiguous Migration Weeks i.e. if the first attempt is Week 1 then the second failure attempt must be in Week 3 (or later) and the third failure attempt must be in Week 5 (or later if the second failed attempt was not in Week 3).

DCC and this respondent also explored matters related to the scope for further site visits (as proposed by other respondents). This respondent expressed concern that this was unlikely to yield material improvement in successful migrations and should not be an excuse to extend the TMAD end date / RP closure for each Cohort.

3.5.2. Areas of Unresolved Disagreement

There were no remaining areas of disagreement with the changes proposed to the TMAD (with the amendments set out above) related to the Exclusion Category based on no WAN attempting migration.

3.5.3. Summary

As a result of these responses received the conclusion version of the TMAD has amendments to Clause 18.7 of the TMAD to allow the Responsible Supplier the right to request re-attempt of solely Dormant Migrations prior to the decommissioning of the relevant Requesting Party. Clause 18.7 (b) in the TMAD has been amended to only reference dormant meters to correct an error highlighted by a respondent. Clause 18.7 (c) in the TMAD has been amended so that attempted migrations are in non-contiguous weeks.

DCC proposes that the Secretary of State re-designates the amendment to TMAD to include Clause 18.7 such that any SMETS1 Installation containing solely Dormant Meters (for IOC and MOC (MDS)) are excluded where the persistent failure to migrate due to no WAN has been demonstrated following three unsuccessful attempts.

3.6. Proposed Exclusion Category - At Least Five Migration Attempts (Various 1 Q5)

DCC sought views on the proposal for an Exclusion Category (across IOC, MOC (MDS) and MOC (Secure)) based on at least five Migration attempts asking: ***"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."***

3.6.1. Respondents' Comments / DCC Analysis / Clarifications

All ten of the respondents provided a response to this question. Nine of these respondents supported the proposed exclusion category based on the persistent failure to migrate demonstrated by at least five distinct failed attempts.

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

Two respondents expressed support for the proposal to exclude where there is persistent failure to migrate based on five distinct migration attempts. These respondents also proposed that the Responsible Supplier should be given the opportunity to request further migration attempts where the criteria for persistent failure has been met for this exclusion category. Their proposal would allow the Responsible Supplier to consider taking action to resolve an issue e.g. arrange a site visit to assess the situation. DCC proposes to adopt this approach via amendments to Clause 18 of the TMAD to allow the Responsible Supplier the right to request re-attempt prior to the decommissioning of the relevant Requesting Party.

One respondent agreed with the proposal to exclude SMETS1 installations that fail to migrate after at least five attempts that is proposed to apply for all cohorts except FOC (as DCC has limited evidence so far for FOC). This respondent expressed concern that a SMETS1 Installations could be excluded before all the migration maximisation initiatives have been complete. This respondent sought confirmation from DCC that any excluded dormant SMETS1 Installation would be re-tried if it is impacted by a subsequent unblocking initiative e.g. both aspects of the GT01 improvements. DCC can confirm that it continues to exhaust unblocking activities ahead of bringing forward proposals for exclusions. In relation to the GT01 failure, DCC can confirm that GT01 Pt2 (partial migration - migrate electricity / exclude gas) will only be deployed following evidence gathering from the changed GT01 check to be 72 hrs that was introduced in early November 2021.

One respondent suggested that there should be no limit in the number of retries given the cost implications on asset replacement compared to the cost of a further migration attempt. There are capacity constraints within DCC's migration solution as described in the Migration Scaling Methodology; it is clearly inefficient for DCC to continue endless retries where persistent failure has been demonstrated. DCC discussed this matter with the respondent. The respondent has also proposed that the Responsible Supplier should be given the opportunity to request further migration attempts where the criteria for persistent failure has been met for this exclusion category. Their proposal would allow the Responsible Supplier to consider taking action to resolve an issue e.g. arrange a site visit to assess the situation. DCC proposes to adopt this approach via amendments to Clause 18 of the TMAD to allow the Responsible Supplier the right to request re-attempt prior to the decommissioning of the relevant Requesting Party.

One respondent (who is a MAP) indicated that it is unable to assess the impact on their individual business as the approach does not provide reporting to MAPs and thus unable to support this proposed exclusion. However, the respondent indicated the improvement in repeat retries for migration was extremely low. DCC understands the concern raised by the respondent in relation to the overall regulatory structure with DCC's relationship lies with the Responsible Suppliers rather than the MAPs. DCC would encourage all MAPs to engage with their customers on matters related to a SMETS1 Installation where there is persistent failure to migrate based on five distinct migration attempts.

One respondent suggested that the SMETS1 replacement obligation was sufficient to address such persistent failures to migrate. This Respondent expressed the view that there is no additional value in excluding such devices from migration before the TMAD expiry date as Responsible Suppliers should retain the opportunity to resolve errors with such SMETS1

Installations as they deem fit. DCC has explained to the respondent that it was inefficient for DCC to repeat dormant migration attempts where there was persistent failure which was accepted by the respondent. The respondent indicated that there may be circumstances where either the Responsible Supplier (or the MAP) may be able to resolve a migration failure related to Dormant Meters. DCC outlined a proposal by another respondent to allow the Responsible Supplier to request further attempts where the exclusion criteria were met for a dormant e.g. following a reboot of the CH for dormant devices in a SMETS1 Installation where there had been persistent failure to successfully migrate (i.e. at least 5 failures). The respondent indicated that this approach would be welcomed and address their concern regarding the five retries exclusion.

One respondent sought clarity as to the nature of the errors leading to such persistent migration failures. This respondent accepts that if these errors are unresolvable then exclusion is reasonable. However, the respondent considers that if there is a chance that these sites could be made migratable, then exclusion should be delayed until the last possible moment. DCC discussed these concerns with the Respondent. The respondent accepted DCC's position that it was inefficient to continue endless retries where persistent failure has been demonstrated. The respondent went on to explain that given the materiality of each exclusion they consider it vital that further retries are attempted where success may be possible. DCC outlined a proposal by another respondent to allow the Responsible Supplier to request further attempts where the exclusion criteria were met for a SMETS1 Installation containing dormant meters e.g. following a reboot of the CH for dormant devices in a SMETS1 Installation where there had been persistent failure to successfully migrate (i.e. at least 5 failures). The respondent indicated that this approach would be welcomed and address their concern regarding the five retries exclusion.

3.6.2. Areas of Unresolved Disagreement

There were no remaining areas of disagreement with the changes proposed to the TMAD covering the Exclusion Category based on at least five Migration attempts.

3.6.3. Summary

As a result of these responses received the conclusion version of the TMAD has amendments to Clause 18.8 of the TMAD to allow the Responsible Supplier the right to request re-attempt of solely Dormant Migrations prior to the decommissioning of the relevant Requesting Party.

DCC proposes that the Secretary of State re-designates the amendment to TMAD to include Clause 18.8 such that any SMETS1 Installation containing solely Dormant Meters (for IOC, MOC (MDS) and MOC (Secure)) are excluded where the persistent failure to migrate has been demonstrated following five unsuccessful attempts.

3.7. Where GT01 persistently fails, enable Migration for the ESME but Exclusion for the GSME (Various 1 Q8)

DCC sought views on the proposals to migrate only the electricity meter due to persistent GSME-HAN connectivity failures and an associated Exclusion Category for the gas meter across IOC and MOC (Secure) asking: ***“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.”***

After this consultation was issued, the implementation for MOC (Secure) was delayed until mid-2022 due to the solution development schedule. Thus, DCC is only, as part of this

conclusion, considering the merits of introducing this change for IOC and will re-consult on implementation for MOC (Secure) in due course.

3.7.1. Respondents' Comments / DCC Analysis / Clarifications

All ten of the respondents provided a response to this question. Six of these respondents expressed supported the principle of partial migration (migrate the electricity meter / exclude the gas meter) due to persistent failure of HAN communication with the GSME.

One respondent agreed with the proposal to migrate SMETS1 Installations without the GSME when the GSME persistently fails to communicate. This respondent understood the limitations with this approach but believe that partially migrating a SMETS1 Installation is preferable to migrating no devices within the SMETS1 Installation.

One respondent indicated 'in principle' support for the proposal to allow the partial migration of these installations to proceed, raising some issues. DCC welcomes such support for the proposal and discussed the matters raised with the respondent. This respondent sought to understand why the GSME could not be commissioned following the migration of all the other devices in the SMETS1 Installation. DCC explained that the gas meter can't be commissioned post-migration of the SMETS1 Installation as the DCC solution doesn't allow for SMETS1 gas meter commissioning other than via Migration and it would be a material solution change to provide for such post-migration commissioning. The respondent also outlined their commercial concerns related to a decision to strand assets without affording the impacted Responsible Suppliers every opportunity to address any problems. For the GT01 Pt2 (migrate Electricity / exclude Gas), the respondent indicated that a change in the process whereby the Responsible Supplier always makes the decision / provides the instruction to exclude the gas meter irrespective of it being Active or Dormant was preferable.

One respondent indicated broad support for the proposal to implement GT01 Pt2 (migrate electricity exclude gas) but also expressed some concerns. DCC discussed the respondent's response to confirm the position. The respondent indicated that there were some challenges for energy suppliers in successfully supporting a migrated SMETS1 electricity meter and a SMETS2+ gas meter with a hot shoe in the same premises i.e. some energy suppliers may decide on full SMETS2+ replacement rather than partial migration. The respondent also indicated that they had less concerns regarding devices operating in credit mode but would not support partial migration for pre-pay customers. DCC highlighted that dormant migrations for IOC are always in credit mode. The respondent indicated that they will need to decide on whether they utilise this approach based on their arrangements with their service providers. DCC explored the scope for an approach whereby the Responsible Supplier always makes the decision / provides the instruction to exclude the gas meter irrespective of it being Active or Dormant (as suggested by other respondents). The respondent indicated that the proposed approach needed careful consideration as it could create further commercial issues related to the allocation of stranded asset cost for Dormant devices. On this basis DCC considers it is prudent to re-consult on the approach to partial migrations where there is one or more dormant devices within the SMETS1 Installation. On this basis the TMAD drafting in Clause 5.8C is amended to restrict partial migrations to SMETS1 Installations containing solely Active Meters pending such further consultation.

One Energy Supplier raised a concern during the Webinar related to the circumstances where a stand-alone SMETS2+ gas meter was installed following migration of the SMETS1 electricity meter and exclusion of the SMETS1 gas meter. This Energy Supplier wanted to understand whether there would be problems created by having two separate communications hubs in the same premises. DCC held a separate meeting with this Energy Supplier and another Energy Supplier who also expressed interest regarding this topic during the Webinar. On the subsequent call, DCC explained that, where there are two separate

communications hubs in the premises, the 8.2 SRV (Read Inventory) may be problematic in specific circumstances. The impact on the 8.2 SRV only applies where it is triggered by either the address or UPRN, as using MPxN as the trigger would return the correct information in all circumstances. DCC also highlighted that the alternative choice for a Responsible Supplier is a complete SMETS2+ replacement (which is not ruled out by this electricity meter only Migration). These Energy Suppliers were content with DCC's explanation. One of these respondents subsequently provided a supportive response to this question noting that DCC had confirmed to them that a SMETS1 ESME + SMETS2 GSME is viable but the 8.2 SRV may be impacted.

One respondent expressed general support for the principle proposed by DCC but raised concern that three migration attempts, each in a separate migration week, (as proposed in Clause 5.8B (b)) didn't demonstrate persistent failure based on their operational experience. The respondent considered that the proposed approach may mean that certain GSMEs may be unnecessarily excluded as a result of a combination of short-term transitory factors that can affect HAN connectivity. This respondent indicated that a longer period would be prudent suggesting an elapsed timeframe of two months. DCC accepts that the principle of the 'no HAN' exclusion should be based on demonstrating persistent failure. DCC has discussed the concerns raised with the respondent. The respondent confirmed that an alternative formulation that captured the concept of an extended period to demonstrate persistent failure would be acceptable e.g. once per fortnight. On this basis, DCC has amended the approach to account for the concerns raised. The revised approach (as captured by the update to Clause 5.8B (c)) is that each of the three separate attempts to migrate shall be in non-contiguous Migration Weeks i.e. if the first attempt is Week 1 then the second failure attempt must be in Week 3 (or later) and the third failure attempt must be in Week 5 (or later if the second failed attempt was not in Week 3).

One respondent (who is a MAP) indicated that partial migration impacts MAPs in two ways. First, this guarantees that the GSME will need to be exchanged where communication with the CH is insufficient to support migration. Second, this increases the risk that the ESME is removed as some responsible Suppliers will prefer complete SMETS2+ replacement. DCC notes the concerns raised by the respondent in relation to excluding gas meters where persistent HAN failure is demonstrated. This respondent also indicated that partial migration is reliant on the site engineer having hot shoes and installing them for a GSME only exchange – which the respondent considers unlikely. DCC agrees that some Responsible Suppliers will replace all assets in this circumstance rather than proceeding with partial migration. DCC also observes that the alternative to partial migration is replacement of the entire SMETS1 Installation with SMETS2+ Devices. The respondent queries whether three tries is a sufficient demonstration of persistent HAN failure for a dormant gas meter and whether further attempts would be prudent. DCC notes that it will be re-consulting on the approach to partial migrations for a dormant GSME and will consider this point further in that consultation. The respondent indicated that it is unable to assess the impact on their individual business as the approach does not provide reporting to MAPs. The consequence of the overall regulatory structure is that DCC has a relationship with Responsible Suppliers rather than MAPs. DCC would encourage all MAPs to engage with their customers on matters related to exclusions. MAPs need to engage with Responsible Suppliers on such matters to understand any possible impact. This respondent indicated that the consultation document did not specify if additional retries resulted in increased successful Migrations. DCC have previously attempted devices that presented with the GT01 check failure up to five times and saw no material benefit after the third attempt. These attempts were undertaken with the previous configuration of the GT01 check at 24 hours, with the increase in this check to be 72 hours and the fact the migration attempts have subsequently failed numerous times, in the DCC's opinion three attempts is a reasonable number of attempts to establish communications with the GSME device.

One Respondent expressed concern related to the benefits of implementing partial migration for MOC (Secure). DCC explained to the respondent that the proposal for partial migration would not be implemented for MOC (Secure) in December 2021, with deployment planned for mid-2022. DCC will need to undertake a further consultation prior to the implementation of this change for MOC (Secure).

One respondent objected to the proposal, stating that there is limited benefit in partial migrations where there are comms issues to the gas meter. This respondent considered there would be potential benefit if the SMETS1 replacement obligation was extended. DCC discussed this matter with the respondent. The respondent indicated that they wouldn't replace the excluded SMETS1 gas meter with a SMETS2+ gas meter, but would rather replace all the assets at a site. Thus, the respondent's view is that it would be preferable to extend the SMETS1 replacement obligation for such sites to maximise the benefit from the SMETS1 electricity meter operating in smart mode. DCC indicated that this wasn't a matter for DCC but that this message has been relayed to BEIS. The Respondent indicated that for the GT01 Pt2 (migrate Electricity / exclude Gas), they would prefer a process whereby the Responsible Supplier always makes the decision / provides the instruction to exclude the gas meter irrespective of it being Active or Dormant.

One respondent (that represents a range of member organisations) supported the proposal to enable the partial migration of a SMETS1 Installation where the GSME is non responsive or intermittent in response, indicating that this was preferable to failing to migrate the whole installation. The respondent indicated that some of their members may choose to replace the meter sets with SMETS2+ anyway. This respondent also sought confirmation why it would not be possible to commission the GSME post migration. DCC discussed this matter with the respondent. DCC welcomed the broad support. DCC explained that the gas meter can't be commissioned post-migration of the SMETS1 Installation as the DCC solution doesn't allow for SMETS1 gas meter commissioning other than via Migration and it would be a material solution change to provide for such post-migration commissioning. The differing views between the respondent's members were discussed. The respondent indicated that generally their members supported the need for exclusions.

One respondent rejected the proposal setting out that it would deliver poor experience for consumers, technical complexity, and increase their costs. This respondent indicated their preference for a full SMETS2+ replacement. DCC and the respondent discussed the matter of partial migration (Migrate Electricity / Exclude Gas). The respondent indicated that a SMETS2+ gas meter / hot shoe was unlikely for their business as two CHs is not the ideal operational approach for their customers. The respondent set out that it does not want to use partial migration for their Dormant Meters. DCC notes that it will be re-consulting on the approach to partial migrations for a dormant GSME and will consider this point further in that consultation. The respondent indicated that it is undecided whether they will use partial migration for their Active Meters and their position therefore requires further assessment.

3.7.2. Areas of Unresolved Disagreement

The only area of unresolved disagreement was the divergence of views on the principle of partial migration (migrate only the electricity meter due to persistent HAN failures and an associate Exclusion Category for the gas meter) with support from some respondents and objection from other respondents. DCC considers it is prudent to proceed with partial migration for SMETS1 Installations where there are solely Active Meters as this will allow those supportive of partial migration to proceed on that basis with their end customers.

3.7.3. Summary

As a result of these responses received the conclusion version of the TMAD has amendments to Clause 5 of the TMAD to restrict partial migration to be for SMETS2 Installations containing solely Active Meters.

Given the differential views across respondents, DCC will be re-consulting on the approach to partial migration where there are one or more Dormant Meters. This consultation will consider the points raised and consult further on an approach for partial Migration covering Dormant Meters. DCC is aiming to issue this consultation before the end of 2021, with conclusion expected early in 2022.

Given that the differing views received relate to SMETS1 Installations where there is at least one Dormant Meter, DCC proposes that the Secretary of State re-designates the amendments to the TMAD covering Clauses 5.8B, 5.8C, 5.8C, 5.8E and 18.5 such that the partial migration (migrate ESME / exclude GSME) can be facilitated for SMETS1 Installations where requested by the Responsible Supplier so long as the both the GSME and the ESME are Active.

3.8. An update on revisions to the SMETS1 PPMID Definition for FOC (Various 1 Q9)

DCC sought views on the proposal not to amend the SMETS1 PPMID definition for FOC asking: ***“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.”***

3.8.1. Respondents’ Comments / DCC Analysis / Clarifications

Nine of the respondents provided a response to this question and all nine supported the proposal not to amend the SMETS1 PPMID definition for FOC.

Seven respondents provided a supportive response to this question without further comment.

The remaining two respondents also supported the proposal. One of these respondents welcomed DCC plans to bring forward further proposals where GroupID='EA', as set out in the consultation document. The other respondent indicated general support for migrating a SMETS1 PPMID and a SMETS1 IHD as this allowed the device to be used post-migration.

3.8.2. Areas of Unresolved Disagreement

There were no areas of disagreement with the proposal not to amend the SMETS1 PPMID definition for FOC.

3.8.3. Summary

As set out in the consultation document, for the part of FOC where GroupID = 'EA', 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. However, it is economically inefficient to take forward a solution development where the solution would only be used for this limited number of SMETS1 Installations.

Given the responses to this consultation DCC will continue engaging with the SMETS1 SMSO (where GroupID = 'EA') to explore alternative approaches to Migrating the impacted 1,000 SMETS1 Installations and will bring forward proposals in this area early in 2022.

3.9. TMAD Expiry Date (Various 1 Q10)

DCC sought views on a proposal to amend the end date in the TMAD asking: ***“Do you agree with DCC’s proposal to amend the TMAD expiry date to be 31 December 2022?”***

3.9.1. Respondents' Comments / DCC Analysis / Clarifications

Nine of the respondents provided a response to this question and all nine supported the proposal to extend the TMAD expiry date.

Four respondents provided a supportive response to this question without further comment.

One respondent provided a supportive response to this question indicating it is essential to allow for migration completion.

One respondent agreed with the proposal to extend the TMAD expiry date but expressed concern that this gives rise to increases in costs e.g. extending the Requesting Party service from each SMETS1 SMSO. DCC discussed this matter with the Respondent. The Respondent accepts the need to extend the TMAD but expressed concern that the likely end date for MOC (Secure) was moving to the right due to the behaviour of other Responsible Suppliers which drives increases in overall DCC cost (and such costs are funded on a market share basis). DCC explained that the second charging objective in the DCC licence (condition 18.6)) requires DCC not to distinguish between SMETS1 and SMETS2 charges. The respondent accepted that a licence amendment would be needed to allow any form of 'polluter pays' charging regime. DCC agreed to highlight this concern to BEIS.

One respondent agreed that the TMAD expiry date needs to be extended from 31 December 2021 but expressed concern that the proposed expiry date of 31 December 2022 will not provide sufficient time in which to complete migrations and thus avoid associated costs of stranded assets. DCC welcomes the respondent's supports for the principle to extend. DCC observes that the respondent considers the 31 December 2022 to be premature as the respondent does not expect migrations to be complete prior to 31 December 2022. However, DCC notes that 31 December 2022 aligns with the licence obligations on Energy Suppliers as set out in the consultation document i.e. the Standard Licence Conditions for gas supply and electricity supply require that any SMETS1 meters that are not enrolled in DCC must be replaced with a SMETS2+ meter by 31 December 2022 (a date set by BEIS). DCC considers it prudent to extend the end date to be 31 December 2022 noting that the TMAD end date could be extended further if required e.g. as a result of BEIS direction. In this context, it is important to note that scope for a further extension does not indicate that DCC is expecting migrations to continue past the SMETS1 replacement obligation. However, TMAD may need to be further extended certain obligations to remain e.g. audit obligations following the de-commissioning of each Requesting Party in Clause 7 of the TMAD.

One respondent supported extending the TMAD expiry date to enable the completion of the Migration of all eligible SMETS1 Installations. This respondent indicated that it is vital that all stakeholders work together effectively to ensure that migrations are completed before this revised date and ensure that there is a clear and consistent exit plan for the SMETS1 enrolment programme. It is important that all Suppliers are given sufficient time and notice to meet their obligations to replace any unsuccessful installations, particularly for FOC. However, this end date should not be open ended as it will drive increases in costs shared. DCC agrees with the desire for prompt migrations to allow appropriate SMETS1 SMSO closure for each cohort in order to control costs.

One respondent supported extending the end date as it is clear that migrations will not be finished by the current TMAD end date. This respondent stated that further DCC delays to migrations, that are outside of supplier control and put the feasibility of meeting the replacement obligation at risk, should be the subject of further industry consultation. DCC has discussed this matter with BEIS who confirmed that rights to Migrate under the TMAD would be extended only where BEIS consider there are grounds to extend the SMETS1 replacement obligation deadline, following consultation.

3.9.2. Areas of Unresolved Disagreement

There were no areas of disagreement with the proposal to amend the end date in the TMAD.

3.9.3. Summary

DCC proposes that the Secretary of State re-designates the amendments to the TMAD covering Clauses 1.3 such that the expiry date of the TMAD is set to be 31 December 2022.

3.10. Re-designation Date for Maximising Migrations (Various 1 Q11)

DCC sought views on the date for amending the TMAD and SMETS1 SVTAD for the maximising migration changes asking: ***“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?”***.

3.10.1. Respondents' Comments / DCC Analysis / Clarifications

Eight of the respondents provided a response to this question and all eight supported the proposal.

Seven respondents provided a supportive response to this question without further comment.

One respondent provided a supportive response to this question whilst restating their concerns related to partial migration (Q8).

3.10.2. Areas of Unresolved Disagreement

There were no areas of disagreement related to re-designating the TMAD and SMETS1 SVTAD on 7 December 2021 for the maximising migrations amendments.

3.10.3. Summary

DCC proposes that the Secretary of State can re-designates the amendments to the TMAD related to maximising migrations on 7 December 2021 or as soon as reasonably practicable within one month.

3.11. Re-designation Date for TMAD Expiry (Various 1 Q12)

DCC sought views on the date for amending the TMAD to extend the end date asking: ***“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?”***.

3.11.1. Respondents' Comments / DCC Analysis / Clarifications

Nine of the respondents provided a response to this question and eight supported the proposal.

Eight respondents provided a supportive response to this question without further comment.

One respondent restated their response to Q10. This respondent agreed that the TMAD expiry date needs to be extended from 31 December 2021 but expressed concern that the proposed expiry date of 31 December 2022 will not provide sufficient time in which to complete migrations and thus avoid costs associated stranded assets. DCC welcomes the respondent's supports for the principle to extend. DCC observes that the respondent

considers the 31 December 2022 to be premature as the respondent does not expect migrations to be complete prior to 31 December 2022. However, DCC notes that 31 December 2022 align with existing licence obligations on Energy Suppliers as set out in the consultation document i.e. the Standard Licence Conditions for gas supply and electricity supply require that any SMETS1 meters that are not enrolled in DCC must be replaced with a SMETS2+ meter by 31 December 2022 (a date set by BEIS). DCC considers it prudent to extend the end date to 31 December 2022 noting that the TMAD end date may be extended further via a number of regulatory routes if subsequently required e.g. BEIS direction.

3.11.2. Areas of Unresolved Disagreement

There were no areas of disagreement related to re-designating the TMAD on 7 December 2021 for the extension to the end date.

3.11.3. Summary

DCC proposes that the Secretary of State can re-designates the amendments to the TMAD related to the expiry date on 7 December 2021 or as soon as reasonably practicable within one month.

4. Summary of Drafting Changes

There are some drafting changes to the TMAD resulting from consultation feedback. There are no changes to the SMETS1 SVTAD. Please note that the changes to the SMETS1 SVTAD were minor consequential amendments to reflect changes in Clause 1.9 of the TMAD and not related to the uneconomic to test matters deferred to the 'Part 2' conclusion.

The TMAD version used for the consultation was based on v16.0. However, there have been changes to the TMAD; the latest version was published as v17.0 on 4 November 2021. Thus, the changes proposed within this conclusion are presented as v18.0 draft as a delta version against the latest v17.

Also, there are a number of drafting changes to improve clarity arising from further review.

Given DCC plans to re-consult on the approach for partial migration for Dormant Meters, the text in Clause 5.8B is replaced with [NOT USED] pending further consultation which is expected in December 2021. The reference to Clause 5.8B in Clause 5.8E is also changed to reference Clause 5.8D.

Clause 5.8C is amended to be solely Active Meters pending further consultation on partial migration related to Dormant Meters.

Clause 5.8C (a) is amended to remove GroupID = 'DA' as the implementation of this change for MOC (Secure) is deferred.

The consultation document was clear that partial migration for IOC the SMETS1 SMSO would check whether the gas meter is operating in credit mode and only allow migration in credit mode (as the incremental implement cost of this check is very low) and there were not adverse comments to this element. However, this detail was included to prevent the Responsible Supplier from proceeding (Clause 5.8C (b)) but the obligation on DCC to reject the request was omitted from the TMAD. This has been rectified by addition of Clause 5.8F in the TMAD.

The format for the Request to Exclude has been specified in Clause 5.8D (a) to be in an electronic format advised by DCC (and a copy of the file format is attached to this conclusion document).

Pending the 'Part 2' conclusion on matters related to uneconomic to test within the DMCT Process, Clause 18.5 of the TMAD has been removed and the remaining elements of Clause 18 renumbered.

A sentence has been added to the end of Clause 18.6, 18.7, and 18.8 to allow the Responsible Supplier to request that DCC re-attempts migration where persistent failure has been demonstrated (prior to the decommissioning of the relevant Requesting Party).

Clause 18.7 (b) has been corrected to make this exclusion only applicable to Dormant Meters.

Clause 18.7 (c) has been amended to provide that each migration week for a failure is non-contiguous.

5. Conclusions

DCC is confident that the versions of the TMAD and SMETS1 SVTAD submitted to the Secretary of State reflects the requirements for document submission.

DCC is of the opinion that it has undertaken appropriate consultation with industry regarding these changes to the TMAD and SMETS1 SVTAD.

DCC has, where necessary, addressed the comments that have been received from industry and where appropriate sought additional feedback from respondents. DCC does not believe that the views expressed result in fundamental amendments to the TMAD and SMETS1 SVTAD and as such further consultation is neither necessary nor appropriate.

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

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

DCC considers that:

- the revised TMAD and SMETS1 SVTAD are defined to a sufficient level of detail for re-designation into the SEC;
- the revised and SMETS1 SVTAD provide an overarching framework which sets out clearly and unambiguously parties' rights and obligations which are consistent / and aligned with the rest of the SEC requirements in relation to SMETS1 Services; and
- the revised TMAD and SMETS1 SVTAD are materially complete, and the content is technically accurate.

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

6. Next Steps

DCC has submitted this conclusions report to the Secretary of State on the date of publication of this document.

DCC expects the Secretary of State to make a decision on whether and when to re-designate the revised TMAD and SMETS1 SVTAD into the regulatory framework for both the unblocking and exclusion amendments.

DCC intends to submit the 'Part 2' conclusion early in 2022.

In early December 2021, DCC intends to provide a briefing on the Request to Exclude process for Responsible Suppliers that are planning to utilise partial migration for their Active Meters in IOC.

Given this consultation process DCC notes the earliest date that the changes to the TMAD and SMETS1 SVTAD could be re-designated is 7 December 2021 and the latest date is 7 January 2021 without requiring a further consultation on the designation date.

7. Attachments

Attachment	Title
1.	TMAD v18.0 draft delta against current version v17.0
2.	TMAD v18.0 draft delta against consultation version v16.x
3.	TMAD v18.0 draft clean
4.	SMETS1 SVTAD v9.0 delta against current version v8.0
5.	SMETS1 SVTAD v9.0 draft clean
6.	Request to Exclude – Electronic File Format V1.0

Table 2 - Attachments